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November 19th, 2025

The Honorable Roger Wicker, Chair
Committee on Armed Services
United States Senate
Washington, DC 20510

The Honorable Jack Reed, Ranking Member
Committee on Armed Services
United States Senate
Washington, DC 20510

The Honorable Mike Rogers, Chair
Armed Services Committee
United States House of Representatives
Washington, DC 20515

The Honorable Adam Smith, Ranking
Member
Armed Services Committee
United States House of Representatives
Washington, DC 20515

Dear Senator Wicker, Senator Reed, Representative Rogers and Representative Smith:

On behalf of SPARC, an organization of college and university libraries across the U.S. dedicated to supporting public access to federally funded research, I respectfully write to urge the inclusion of Section 226 from the Senate-passed National Defense Authorization Act for Fiscal Year 2026 in the final conference report.

Section 226 provides essential stability for institutions of higher education and nonprofit organizations by prohibiting unilateral changes to indirect cost rates—also known as facilities and administration (F&A) rates—for Department of Defense grants and contracts. This protection would remain in effect until DoD develops an alternative indirect cost model in formal collaboration with the extramural research community and establishes a comprehensive implementation plan that provides adequate transition time for affected institutions.

Indirect costs support critical research infrastructure that enables public access to scholarship and advances scientific discovery. They fund library resources, digital repositories, research administration offices, and other essential systems that ensure federally funded research can be properly conducted, disseminated, and preserved for public benefit. Arbitrary or sudden changes to these rates without adequate planning and institutional input would destabilize university budgets, disrupt ongoing research programs, and undermine access to the research resources necessary to realize the full benefits of federal research investments.

Section 226 represents a balanced and prudent approach. It requires the Department of Defense to work collaboratively with the research community in developing any new indirect cost methodology while preventing potentially disruptive unilateral changes during this development period. This framework protects taxpayer interests by ensuring thoughtful policy development while simultaneously preserving the research infrastructure that undergirds American scientific leadership and innovation.

We urge the conferees to adopt the Senate language contained in Section 226. Our community stands ready to work constructively with Congress and the Department of Defense on this important matter.

Thank you for your consideration of this request. I would welcome the opportunity to provide additional information or address any questions you may have regarding this provision.

Respectfully,

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