



July 13, 2026

**Office of Federal Financial Management**

Office of Management and Budget

Executive Office of the President

Washington, DC 20503

**Via: [regulations.gov](https://www.regulations.gov), Docket No. OMB-2026-0034**

**RE: Comments of the Computing Research Association on Proposed Rule, "Regulation for Federal Financial Assistance," 91 FR 32198 (May 29, 2026), Docket OMB-2026-0034**

## **I. Introduction and Organizational Interest**

The Computing Research Association (CRA) respectfully submits these comments in response to the Office of Management and Budget's (OMB) proposed revisions to the Guidance for Federal Financial Assistance, published at 91 FR 32198 on May 29, 2026 (the "Proposed Rule"). CRA strongly opposes numerous provisions of the Proposed Rule that, if finalized, would significantly harm federally funded computing research, compromise the integrity of the scientific enterprise, and undermine the United States' global leadership in technology and innovation.

Founded in 1972, CRA unites industry, academia, and government to advance computing research. CRA's membership includes more than 200 North American organizations active in computing research, including academic departments of computer science and computer engineering, research laboratories and centers in industry and government, and affiliated professional societies.

Federal funding — primarily from NSF, the Department of Energy's Office of Science, DARPA, NRL, ARO, AFOSR, NASA, and NIH — is the lifeblood of fundamental computing research conducted at U.S. universities and research labs. That research has, in turn, offered decades of significant and positive economic and societal benefits to the Nation, some examples of which have been documented by both members of the [computing research community](#) and [federal research agencies](#). The proposed changes would disrupt that research ecosystem in ways that are both damaging and unnecessary. CRA addresses its comments in the order requested by OMB, organized by CFR section number.

## **II. Comments by CFR Section Number**

## **[200.1] — Definitions**

The Proposed Rule introduces or modifies definitional terms in ways that create significant ambiguity for the computing research community. Proposed prohibitions on categories of research — including references to 'Diversity, Equity, and Inclusion' programs and 'gender ideology' — rely on undefined vocabulary. Computing research inherently involves studying topics that include human-computer interaction, accessibility, algorithmic fairness, and AI safety, all of which may inadvertently be characterized as touching on prohibited categories depending on how undefined terms are interpreted by agency reviewers.

CRA urges OMB to withdraw the undefined prohibitions entirely. Vague definitions subject to expansive administrative interpretation violate basic principles of regulatory clarity and due process.

## **[200.106] — Agency Implementation and Responsibilities**

The Proposed Rule substantially expands agency discretion to impose additional conditions on federal awards, including discretion to terminate awards mid-performance for broadly defined policy noncompliance. For the computing research community, this creates serious operational problems. Multi-year computing research projects, including in critical technologies such as AI, cybersecurity, quantum computing, and systems research, can take multiple years and depend on stable, predictable funding environments. Graduate students and postdoctoral researchers whose training depends on grant-supported projects would face severe disruption if awards could be terminated based on retroactive application of new policy criteria. Furthermore, the beneficial impacts and National technical leadership sought by federal investments in long-term research are unlikely to come to fruition, if switches are made hastily.

CRA recommends that OMB clarify that expanded termination authority applies only to documented instances of fraud, waste, abuse, or violation of clearly stated pre-award conditions — not to retroactive policy reinterpretations applied to grants already in performance.

## **[200.112] — Conflict of Interest**

CRA supports strong conflict of interest standards. However, proposed expansions to disclosure requirements for international collaborations risk deterring international scientific partnerships that strengthen U.S. competitiveness. Computing is a global science. U.S. leadership in AI, high-performance computing, cybersecurity, microelectronics, and quantum information science has been built and depends in part on attracting international talent and maintaining collaborative relationships with allied-nation researchers. CRA recommends that conflict of interest provisions be limited to relationships presenting a genuine risk to research integrity or national security, with clear guidance distinguishing those situations from ordinary international academic collaboration.

## **[200.202] — Program Planning and Design**

The Proposed Rule's direction that agencies avoid 'ideological' or 'DEI-related' objectives threatens to exclude scientifically well-grounded areas of computing research from federal support, including research on algorithmic fairness and AI bias — a core computer science problem essential to reliable AI systems in healthcare, criminal justice, and national security — as well as cybersecurity research, accessibility research, and programs that broaden participation in computing. The United States cannot maintain its leadership position in AI and related fields without engaging in world-leading research in AI fairness and bias areas; policy clarity is needed to allow US leadership in these areas to continue. CRA urges OMB to clarify that Section 200.202 does not restrict agencies from funding research with scientific merit merely because the subject matter mentions human diversity, fairness, or accessibility.

## **[200.204] — Notices of Funding Opportunities**

The Proposed Rule would restrict NOFO evaluation criteria in ways that threaten NSF's statutory Broader Impacts criterion, a long-standing, Congressionally authorized component of the NSF merit review process. NSF's Broader Impacts criterion encompasses a wide range of national interests including national security, economic competitiveness, and STEM workforce development, not merely participation by underrepresented groups. A rule that creates regulatory pressure against including Broader Impacts-related criteria in NOFOs undermines these broader national priorities as well. Restricting this criterion through 2 CFR rulemaking would conflict with NSF's statutory mission and the intent of Congress as expressed in the America COMPETES Act. CRA strongly recommends that OMB affirm agency-specific statutory requirements for merit review criteria and confirm the proposed changes to Section 200.204 do not override those.

## **[200.205] — Federal Agency Review of Merit of Proposals**

The Proposed Rule revises Section 200.205 to authorize political appointees to review and override the recommendations of program officers who are informed by scientific peer review panels. Specifically, the rule would permit agency heads and their designees — positions filled by political appointees — to reject or modify the priority rankings of peer-reviewed grant proposals based on consistency with executive policy priorities, without regard to the scientific merit determinations made by independent expert reviewers.

Federal agency leadership has always exercised discretion to adjust peer review outcomes for portfolio management reasons, including achieving balance across subfields, institutions, and geographies, for example. CRA does not object to that discretion. What Section 200.205 proposes is categorically different: it vests override authority in political appointees who are not required to have scientific expertise, and it directs them to apply explicitly political criteria, including whether an award "demonstrably advances the President's policy priorities," rather than scientific ones. This is not portfolio management. It is content-based, political review of scientific funding decisions by officials who may lack the domain expertise to evaluate the work they are overruling.

CRA strongly opposes this provision. The National Science Foundation, which has helped seed U.S. innovation for more than 75 years, has been well-served by its peer review system in which proposals are evaluated by independent scientists with domain expertise. Introducing political appointee override authority directly into the selection process:

- Undermines scientific integrity by allowing non-expert political officials to second-guess the judgments of domain experts regarding scientific merit, methodology, and significance;
- Creates no institutional requirement to document or justify deviations from peer review rankings, eliminating any accountability check on politically motivated overrides;
- Chills entire fields of research, particularly computing research on AI safety, algorithmic transparency, and human-computer systems, whose subject matter may be politically disfavored in a given administration;
- Damages U.S. credibility in the international scientific community, where the independence of American peer review has historically been a competitive advantage in recruiting global talent and forming research partnerships.

CRA recommends that OMB withdraw the proposed political appointee override provisions from Section 200.205 in their entirety and affirm that at agencies that rely on independent scientific peer review, including NSF and NIH, deviations from peer review outcomes must be grounded in scientific or programmatic criteria, not consistency with executive policy priorities.

## **[200.208] — Specific Conditions**

CRA recommends that specific conditions under Section 200.208 be: (1) stated at the time of award, (2) directly related to the programmatic requirements of the award, and (3) not subject to retroactive expansion based on subsequent executive policy changes. Foreseeability and stability of award conditions are essential to the integrity of long-term research programs.

## **[200.218] and [200.219] — Prohibition on Disparate-Impact Liability; Prohibition on Discriminatory Event Services**

These proposed sections introduce substantive prohibitions raising significant First Amendment and academic freedom concerns. Conditioning federal research grants on compliance with particular intellectual positions — including prohibiting scholarly discussion of disparate impact analysis, a well-established area of civil rights law and empirical social science, including human-computer and society-computer interaction research — constitutes viewpoint discrimination incompatible with the First Amendment. CRA urges OMB to withdraw or substantially narrow these provisions and confirm they do not apply to research activities, academic scholarship, or educational programming under federal research awards.

## **[200.220] — Prohibition of Using Federal Funds for Covered Foreign Collaborations**

Proposed Section 200.220 is a new provision that would prohibit the use of federal financial assistance funds for any collaboration with a "covered foreign entity" — a broadly defined category that, as written, could encompass universities, research institutes, and individual scholars in a wide range of countries, including some that are close U.S. allies and research partners.

CRA strongly opposes this provision as drafted. International scientific collaboration is not a threat to U.S. security — it is a cornerstone of U.S. scientific strength. The computing research community in particular depends on robust international partnerships to advance foundational work in AI, cryptography, network science, and systems research. Broad collaboration restrictions, applied bluntly across all federal financial assistance, would:

- Exclude U.S. researchers from multinational projects of direct relevance to U.S. national security and economic competitiveness, such as international AI safety research consortia, global cybersecurity threat intelligence networks, and multi-country quantum computing initiatives;
- Conflict with existing, carefully calibrated export control and foreign influence disclosure frameworks — including the National Science Foundation's established and successful foreign influence disclosure requirements — that already address genuine security concerns without imposing blanket collaboration prohibitions;
- Fail to distinguish between collaborations with adversary nations (e.g., China, Russia, Iran, North Korea) and those with close U.S. allies and partners (e.g., United Kingdom, Germany, Japan, South Korea, Canada, Australia, Israel), since all international collaboration would be treated as presumptively suspect.

If OMB believes additional restrictions on collaboration with specific adversary nations are warranted, then CRA recommends that any such restrictions be: (1) narrowly tailored to specific high-risk countries and entities already identified under existing export control and sanctions law; (2) coordinated and consistent with frameworks already administered by NSF, DOE, DOD, and the intelligence community; and (3) developed in consultation with the research community to ensure they do not inadvertently sever beneficial and security-enhancing international partnerships. The current proposal is far too broad and would cause substantial harm to U.S. scientific leadership and economic competitiveness, with no commensurate security benefit.

## **[200.300] — Statutory and National Policy Requirements**

CRA recommends that Section 200.300 limit award conditions to compliance with applicable federal statutes, validly promulgated regulations issued through notice-and-comment rulemaking, and conditions stated in the notice of funding opportunity at the time of award. Conditions should not be expanded by subsequent executive orders issued after awards have been made.

## **[200.303] — Internal Controls**

The proposed expanded internal control requirements, particularly those requiring monitoring of subrecipients for compliance with new content-based restrictions, would impose significant new administrative burdens on university research institutions operating collaborative computing research projects. Research collaborations have been a key part of U.S. computing research leadership, so CRA recommends that OMB limit expanded requirements to what is clearly necessary to prevent documented fraud, waste, and abuse as demonstrated by a detailed regulatory impact analysis of these compliance costs. Robust oversight of federal research awards is best achieved through the agency Inspector General infrastructure that Congress established for precisely this purpose, not through compliance monitoring obligations imposed on recipients. CRA urges OMB to rely on existing OIG authority and collaborative oversight mechanisms rather than expanding recipient burden as a substitute for institutional oversight.

## **[200.329] — Monitoring and Reporting Program Performance**

Expanded performance reporting requirements that shift researcher attention from scientific work to policy-compliance documentation are inconsistent with the Proposed Rule's stated objective of reducing recipient burden. Computing research grants are already subject to detailed performance reporting reviewed by scientifically expert program officers. CRA urges OMB to continue working to reduce recipient burdens by limiting any expanded reporting requirements to genuine programmatic information rather than political compliance certification.

## **[200.339] — Remedies for Noncompliance**

CRA urges OMB to withdraw proposed § 200.339. This would newly authorize a federal awarding agency to "cooperate with individuals or organizations pursuing their own private cause of action or remedies" against a recipient or subrecipient alleged to be out of compliance with the award. For the computing research community, this provision introduces an open-ended and largely undefined litigation risk into what has historically been an administrative compliance framework governed by specific conditions, corrective action plans, and structured appeal rights under §§ 200.208 and 200.342. Nothing in the text limits the kinds of "private causes of action" an agency may support, nor does it specify procedural safeguards, evidentiary standards, or notice requirements before an agency lends its institutional weight to a private litigant's claims against a university research program. That ambiguity is especially troubling given the preamble's framing of this rule around rooting out disfavored research practices and institutional policies.

This risk is not merely theoretical for the computing research community. Computing research is unusually collaborative and international, often involving multi-institution consortia, open-source contributions, shared datasets, and cross-border co-authorship on foundational work in AI, security, and systems research. A regime in which agencies may actively assist private parties

in suing recipients for perceived noncompliance, without the due-process structure that governs agency-led remedies, will predictably chill exactly this kind of collaboration, as university counsel and grants offices advise researchers to avoid activities that could later be recast as "noncompliant" by an outside party with agency backing. Smaller institutions, minority-serving institutions, and early-career PIs, who lack the legal resources of large research universities, would bear a disproportionate share of this risk, undermining OMB's stated objective of reducing recipient burden and broadening participation in federally funded research.

Finally, § 200.339(b) sits uneasily with the rule's existing enforcement architecture, which channels noncompliance through defined agency-driven remedies specifically so that recipients receive consistent, reviewable treatment. Empowering agencies to instead outsource enforcement energy to private litigants creates the potential for duplicative, inconsistent, and unappealable consequences that bypass the very administrative protections § 200.342 is designed to guarantee. CRA recommends that OMB either remove § 200.339(b) entirely or, at minimum, substantially narrow it—cabining any agency "cooperation" to formal law-enforcement referrals under existing legal authorities, with clear notice to the recipient and preservation of the recipient's existing rights to object and appeal before any private action proceeds.

## **[200.340] — Termination and Suspension**

CRA is deeply concerned by expanded agency authority to terminate research awards for policy-based reasons without statutory violation, regulatory violation, or fraud. Mid-grant termination based on policy grounds poses an existential threat to the stability of federally funded research programs and to the careers of graduate students, postdoctoral researchers, and junior faculty who depend on these awards. CRA urges OMB to reinstate clear limits on termination grounds, consistent with the requirements of the Administrative Procedure Act (APA) for reasoned agency action, and to provide explicit procedural protections — including advance notice and an opportunity to respond — before any federally funded research award is terminated for policy-related reasons.

## **[200.400] — Policy Guide**

OMB should confirm that costs associated with conducting peer-reviewed, scientifically meritorious research are allowable regardless of subject matter, provided the research was selected through normal competitive scientific merit review. Interpretive uncertainty about the allowability of costs for research on algorithmic fairness, AI ethics, accessibility, or related topics would have a chilling effect on scientific inquiry and would likely impede US technical leadership in these areas of significant economic importance.

## **[200.421] — Advertising and Public Relations**

The Proposed Rule significantly revises Section 200.421 to restrict the use of federal award funds for public communications by grant recipients, including communications about the research being conducted under the award and its results. The proposed restrictions would limit

the ability of researchers to: publicize their federally funded research findings through press releases and media engagement; present research results at public events, community forums, and science outreach activities; and produce plain-language summaries or educational materials about award activities intended for general audiences.

CRA strongly opposes these restrictions. Public communication of federally funded research results is not a luxury. It is a core accountability mechanism that serves the interests of American taxpayers. When researchers funded by NSF, DOE, or DARPA communicate their findings to the public, they fulfill the basic democratic obligation to account for how public funds are being used. It cultivates the entrepreneurial and societal follow-ups that create broad and helpful impacts long-term. Restricting these communications does not protect taxpayers; it shields federally funded activity from public scrutiny and informed evaluation.

The computing research community in particular has a longstanding commitment to public engagement on topics of profound societal importance, including AI safety and governance, cybersecurity threats, privacy-enhancing technologies, and the broad societal impacts of digital systems. Restricting researchers' ability to communicate with the public about these topics — at a time when the public desperately needs accurate, expert-informed information about the technologies shaping their lives — would be contrary to the national interest. Furthermore, some public input and comment has long served to help inform and assist researchers; restrictions that reduce this possibility of engagement diminish potential enhancement and advancement.

CRA recommends that OMB withdraw the proposed restrictions on public communications in Section 200.421, and instead affirm that the costs of disseminating research results to the public — including through press releases, public lectures, community engagement activities, and educational outreach — are allowable costs under federal research awards, consistent with longstanding policy and in furtherance of the transparency goals the Proposed Rule itself claims to advance.

## **[200.432] — Conferences**

The Proposed Rule substantially revises Section 200.432 to require that grant recipients obtain express prior approval from the federal awarding agency before using award funds to attend or host conferences, seminars, or other professional gatherings. Under the proposed revision, this pre-approval requirement would apply to individual conference attendance, not merely to the hosting of large conferences with federal funds.

CRA strongly opposes the individual conference pre-approval requirement as applied to academic research conferences. Attendance at research conferences is not a discretionary luxury in computing research — it is how science is done. The computing research community advances knowledge primarily through peer-reviewed conference publication and presentation. Unlike many other scientific fields where journals are the primary venue for scientific communication, computing research depends on conferences as the primary, high-prestige venue for disseminating results and receiving peer feedback. For example:

- The ACM Conference on Neural Information Processing Systems (NeurIPS), the International Conference on Machine Learning (ICML), the IEEE Symposium on Security

and Privacy (S&P), and the ACM SIGCOMM Conference are among the most prestigious and scientifically important venues in computing. Graduate students and researchers presenting at these venues are not engaged in optional networking — they are fulfilling a core scientific purpose of the research grant.

- Conference presentations occur on short timelines, as peer review acceptance notifications are typically issued only 6-12 weeks before the conference date. A bureaucratic pre-approval process cannot operate at this pace and would effectively prevent researchers from presenting accepted work.
- Requiring individual prior approval for each conference trip creates an enormous administrative burden for both researchers and federal program officers, who would be inundated with approval requests for routine academic activities with no meaningful risk of waste or abuse. This is contrary to the stated goal of the reduced-burden goal OMB claims to pursue.
- Conferences are a primary mechanism for researchers and students to meet with government officials and the commercial community — to share results, exchange data, discuss technology transfer, and explore employment and study opportunities. Adding administrative disincentives to attendance will have a negative effect on all those activities.

Given that the academic speed of conferences is measured in months, while the speed of scientific journals is measured in years, requiring conference preapproval, and functionally disincentivizing conference attendance, will harm American computing researchers' competitiveness in fields that are key national and Administration priorities such as AI and quantum.

If OMB's concern is the cost of large conferences or unjustified travel, existing guidance already provides agencies with tools to address those concerns without imposing blanket pre-approval requirements on all conference attendance. CRA recommends that OMB: retain the current framework under which conference-related costs are allowable without prior approval if they meet the general allowability standards and explicitly confirm that individual researcher attendance at peer-reviewed scientific conferences is not subject to prior approval requirements.

## **[200.450] — Lobbying**

CRA supports existing lobbying restrictions and urges OMB to confirm that participation in federal notice-and-comment rulemaking, providing scientific testimony to Congress, and similar public engagement activities remain outside the scope of the lobbying prohibition, consistent with existing law.

## **[200.454] — Memberships, Subscriptions, and Professional Activity Costs**

The Proposed Rule revises Section 200.454 to make professional society memberships and subscriptions presumptively unallowable as direct costs on federal research grants, unless the

recipient can demonstrate that the membership is directly necessary for the performance of the specific federal award.

CRA strongly opposes this change. Professional society memberships are a routine, modest, and essential cost of scientific research. For computing researchers, memberships in organizations such as the Association for Computing Machinery (ACM), the Institute of Electrical and Electronics Engineers (IEEE), the Society for Industrial and Applied Mathematics (SIAM), and the USENIX Association are not optional career-development benefits — they are the primary means by which researchers:

- Access the peer-reviewed scientific literature essential to their research, through society digital libraries such as the ACM Digital Library and IEEE Xplore, which collectively provide access to millions of computing research papers;
- Participate in the peer review process as reviewers, area chairs, and program committee members — the volunteer labor on which the entire scientific publication system depends;
- Present their research at society-sponsored conferences — which, as described above, are the primary publication venue in computing;
- Access professional standards documents, technical reports, and other practitioner resources relevant to research on cybersecurity, networking, software engineering, and other applied computing fields.

Making these costs presumptively unallowable would force researchers to individually justify, on a grant-by-grant basis, why a membership in the ACM or IEEE is necessary — a requirement that would generate enormous administrative burden and paperwork for researchers and program officers alike, while producing no meaningful reduction in waste. The cost of a professional society membership — typically \$100-\$300 per year — is trivial relative to the scientific value it enables.

Furthermore, treating professional society memberships as presumptively wasteful sends a profoundly damaging signal about the federal government's relationship with the scientific community. Professional societies perform essential public functions: they set ethical standards for their fields, maintain codes of conduct, organize peer review, and serve as authoritative voices on matters of scientific policy. Treating their membership dues as suspect federal expenditure undermines these institutions and the scientific infrastructure they provide.

CRA recommends that OMB withdraw the proposed revision to Section 200.454 and retain professional society memberships as allowable direct costs under federal research awards, subject to existing reasonableness standards. At minimum, OMB should carve out memberships in professional scientific and engineering societies as categorically allowable, consistent with their essential role in the research enterprise.

## **[200.461] — Publication and Printing Costs**

CRA urges OMB to affirm that the costs of open-access publication of federally funded research results remain allowable costs under federal research awards, consistent with federal public

access policy. Open-access publication is critical to ensuring that taxpayers benefit from the research their dollars support and that U.S. research findings can be freely used by U.S. industry and the broader scientific community.

## III. Broader Concerns Regarding Research Funding Stability

**Impact on U.S. Competitiveness.** The United States is engaged in a technology competition with China and other nations for leadership in artificial intelligence, quantum computing, semiconductor design, and cybersecurity. That competition will be won by investing in fundamental research. The policy framework proposed in this rule would subject federally funded research to ongoing political review, introduce political appointee override authority into the grant selection process, create instability in multi-year research programs, broadly restrict international collaboration, and chill entire areas of computing research. The proposed rule would significantly advantage our competitors rather than protect American interests. China has dramatically increased its investment in fundamental computing research in an effort to catch up to and surpass the U.S. The U.S. research community's ability to attract and retain the world's best computing researchers, and thereby maintain our technological lead, depends on the stability, openness, and integrity of the U.S. research funding system.

**Impact on the Research Workforce.** Critical parts of computing research are conducted by graduate students and postdoctoral researchers whose training is funded by federal grants. Disruption to the federal research funding system — through grant terminations, restrictions on research topics, barriers to conference attendance, and increased compliance burden — directly harms these early-career researchers. CRA's workforce data consistently show that the pipeline of Ph.D.-trained computing researchers is already insufficient to meet the demands of U.S. industry, government, and academia. Policies that make federal research funding less stable and less predictable will worsen this shortage.

**Cumulative Regulatory Burden.** Considered individually, each of the proposed changes in this rule might be characterized as a modest adjustment. Considered cumulatively, the combined burden on a federally funded research laboratory is severe. A computing research group operating under the Proposed Rule would face: prior approval requirements for individual conference attendance; justification requirements for professional society memberships; restrictions on public communications about research findings; political appointee review of scientific merit rankings; expanded compliance monitoring for subrecipients; and heightened risk of mid-grant termination based on shifting policy interpretations. The aggregate compliance burden imposed by these requirements would redirect a substantial fraction of researcher time from scientific work to bureaucratic documentation — the opposite of the reduced-burden goal OMB claims to pursue.

**Regulatory Impact Analysis.** The Proposed Rule does not include a sufficient regulatory impact analysis of the costs imposed on university research institutions and the research

ecosystem. CRA urges OMB to conduct and publish a detailed economic analysis — including estimates of compliance costs, the value of research disrupted by mid-grant terminations, and the long-term economic and security costs of reduced U.S. research investment — before finalizing any of the proposed changes.

## IV. Conclusion

CRA strongly urges OMB to withdraw or substantially revise the Proposed Rule.

Computing research is among the most important investments the United States makes in its long-term economic and national security. The federal research funding system — built over decades on the foundations of peer review, scientific independence, and stable grant conditions — has produced transformative technologies including the internet, GPS, modern cryptography, and the foundational advances in machine learning that underpin today's AI industry. The Proposed Rule, if finalized in its current form, would erode those foundations and jeopardize the research enterprise that has long sustained American technological leadership.

CRA respectfully requests that OMB give serious consideration to these comments and to the comments of the broader scientific community before finalizing this rule. CRA and its member organizations stand ready to engage with OMB on constructive approaches to improving transparency and accountability in federal research funding that do not undermine the scientific enterprise.

### **Computing Research Association**

1828 L Street, NW, Suite 800

Washington, DC 20036

[cra.org](http://cra.org)

#### *Point of Contact:*

Peter Harsha

COO & Senior Director, Government Affairs

[harsha@cra.org](mailto:harsha@cra.org)

Brian Mosley

Associate Director, Government Affairs

[bmosley@cra.org](mailto:bmosley@cra.org)