COGR
Advancing Effective Research Policy

THE STOPPING POLICY

What Changes for Research Institutions

U.S. Government Policy for Stopping High-Risk Life Sciences Research

BEFORE: 2024 DURC/PEPP POLICY

RISK IDENTIFICATION & MITIGATION

The goal was to identify and mitigate risks.

NARROWER SCOPE

Narrower scope of scientific activities requiring review.

FEWER REVIEW REQUIREMENTS

Required review for biosafety/biosecurity concerns.

NO RESEARCHER CERTIFICATION REQUIREMENTS

PIs were not required to personally attest research determinations.

NOW: STOPPING POLICY

ID & PROHIBITION RESTRICTION

Goal is to prohibit/restrict high-risk research from being conducted.

BROADER SCOPE

Applies to broadly defined "life sciences" research.

ADDITIONAL REVIEW REQUIREMENTS

Requires review for biosafety/biosecurity AND international research of concern.

NEW RESEARCHER CERTIFICATION REQUIREMENTS

PIs must attest their research determinations & institutions must attest that PI's attestation is correct.

4 THINGS INSTITUTIONS NEED TO KNOW

1 THE NET IS MUCH WIDER

Institutions receiving federal life sciences funding must develop mechanisms to identify DGOFR, potential DGOFR, and IROC across all life sciences research, regardless of funding source.

2 NEW INSTITUTIONAL INFRASTRUCTURE

Institutions must establish the people, processes, and structures to implement the Policy.

PI → IRE → ICDGOF → FEDERAL AGENCY/ ITPRB

- ✓ Establish an Institutional Review Entity (IRE)
- ✓ Designate an Institutional Contact for DGOFR (ICDGOF)
- ✓ Establish institutional review/oversight processes
- ✓ Build attestation, certification, training, and recordkeeping mechanisms.

3 FUNDING CONSEQUENCES DEPEND ON THE CATEGORY

Research categories have different review requirements and funding implications.

DGOFR
Federal funding prohibited

Potential DGOFR
ITPRB review required prior to federal funding

IROC: Country/Entity of Concern
Federal funding prohibited

Other Risky International Research
Risk-based review required.

4 THE COMPLIANCE STAKES ARE HIGH

- Immediate revocation of federal funding
- Up to 5 years ineligible for federal life sciences funding
- Potential False Claims Act liability
- Applies to violations of oversight, tracking and reporting obligations or applicable agency regulations

WHAT INSTITUTIONS SHOULD DO NOW

ASSESS
Assess existing biosafety/biosecurity infrastructure, policies, and programs.

DESIGN
Design escalation and decision-making processes for identification and review.

CONNECT
Connect sponsored programs, biosafety, and research security functions.

TRAIN
Train PIs and institutional personnel on policy requirements and processes.

PREPARE
Prepare systems for attestations, certifications, monitoring, and reporting.

RAPID IMPLEMENTATION TIMETABLE

Full compliance with Stopping Policy is expected by January 16, 2027.

AGENCY IMPLEMENTATION

Each federal life sciences agency will implement the Policy separately with EOP oversight to align plans across agencies.

USG STOPPING POLICY

Scan to read the full text.