

October 30, 2025

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

The Honorable Jack Reed Ranking Member Senate Armed Services Committee United States Senate Washington, DC 20510 The Honorable Mike Rogers Chairman House Armed Services Committee U.S. House of Representatives Washington, DC 20515

The Honorable Adam Smith Ranking Member House Armed Services Committee U.S. House of Representatives Washington, DC 20515

Dear Chairman Wicker, Chairman Rogers, and Ranking Members Reed and Smith,

On behalf of the Coalition for National Security Research (<u>CNSR</u>), a 150-member-plus coalition of industry, academia, scientific and professional associations, and non-profits, we write to thank you for your support for the Defense Science and Technology (S&T) program in the fiscal year (FY) 2026 National Defense Authorization Act (NDAA), which sets authorized funding levels for the 6.1-6.3 program elements and establishes or modifies S&T policy. With this letter, we aim to summarize CNSR's perspective on the provisions in the House and Senate NDAAs (H.R. 3838 and S. 2296) that most directly impact our membership organizations and their relationships with the Department of Defense (DoD).

Prohibition on modification of indirect cost rates

CNSR is grateful that S. 2296 includes a prohibition on modification of indirect cost rates for institutions of higher education and nonprofit organizations (Sec. 226). While the change is on hold due to legal proceedings, we are concerned that, if allowed to take effect as written, DoD's arbitrary change to indirect cost reimbursements unnecessarily puts at risk the nation's ability to carry out foundational research that underpins our national security and technological superiority. Sec. 226 provides the Department with clear directions to use a deliberative, consultative, and government-wide approach to make changes to indirect costs in collaboration with institutions of higher education, scientific societies and higher ed associations, non-profit and other research organizations, and Congress. CNSR supports including this language in the conference agreement.

Efforts to Improve DoD's Innovation Ecosystem

Both H.R. 3838 and S. 2296 include provisions that aim to improve DoD's innovation ecosystem. CNSR members represent the researchers who work at DoD laboratories, receive extramural grants from each of the Services and the Office of the Secretary (OSD), and contract with DoD components. The research conducted by CNSR members and the communities they represent spans the full range of S&T disciplines and serves as the driving force behind the transformative innovations that ultimately benefit our warfighters. Importantly, this ecosystem relies not only on mission-focused applied research, but also on the curiosity-driven basic science that has historically been the wellspring of breakthrough discoveries.

Several provisions in the House and Senate bills have the potential to create new or expand existing Defense Science and Technology programs. If appropriately supported through appropriations, these

programs have the potential to supplement DoD's robust innovation ecosystem, all in support of DoD's national security mission; CNSR supports their inclusion in the conference agreement:

- H.R. 3838, Sec. 913 Authority to establish regional outreach centers for the Defense Innovation Unit which aims to streamline interactions between DIU and the private sector, academic and other mission partners.
- H.R. 3838, Sec. 1842 **Defense Industrial Resilience Consortium** which aims to address challenges and limitations of the industrial base to ensure that the Armed Forces are equipped with the capabilities necessary to effectively respond to national security challenges.
- S. 2296, Sec. 211 **Modifications to defense research capacity building program** which aims to improve funding opportunities executed in Program Element 0601228D8Z.
- S. 2296, Sec. 219 **National Security and Defense Artificial Intelligence Institute** which could provide an opportunity for DoD to focus on a cross-cutting challenge or foundational science for AI systems in the national security and defense sector.
- S. 2296, Sec. 232 **Department of Defense biotechnology strategy** this strategy would focus on the national security implications of emerging biotechnologies, including the future role that biotechnology will play in defense, and means to improve the industry, interagency, and international relationships in the sector.
- S. 2296, Sec. 243 Quarterly reports on termination of critical technology research awards which would provide important transparency on Defense S&T programs.
- S. 2296, Sec. 807 **Combatant Command experimentation authority** would allow combatant commands to fund the development of innovative technologies and capability solutions to address operational needs identified by the combatant command.
- S. 2296, Sec. 1057 **Irregular Warfare Exercise Laboratory** which has the potential to provide new opportunities for researchers to leverage their expertise in support of the full-spectrum irregular warfare activities.
- S. 2296, Sec. 1059 University-based secure innovation incubator program of Department of **Defense** which could support institutions of higher education's efforts to access secure facilities and networks.
- S. 2296, Sec. 1622 **Digital sandbox environments for artificial intelligence** which would identify, coordinate, and advance efforts to develop virtual environments to support AI experimentation, training, and development across DoD.

CNSR also has concerns about provisions we worry would have an overall negative impact on DoD's innovation ecosystem. We certainly understand the real concerns that motivate these provisions, however, any prohibitions must be carefully developed to limit unintended, negative impacts.

- H.R. 3838, Sec. 229 Prohibition of Availability of Funds for Gain of Function Research the
 provision as written includes an overly broad of definition of gain of function that risks
 accidentally prohibiting efforts to understand emerging infectious diseases or develop new
 medical countermeasures.
- H.R. 3838, Sec. 1049 Prohibition on Availability of Funds for Institutions of Higher Education That Allow Antisemitic Demonstrations the definitions in this provision are sufficiently vague as to raise significant questions on how it would be implemented.

Support for Basic Research Funding

CNSR commends Congress's objective to enhance DoD's technological innovation landscape and recognize the importance of rapidly advancing cutting-edge technologies for national defense. However, we emphasize the critical need to preserve and support fundamental scientific exploration alongside mission-driven research.

The pursuit of groundbreaking technologies requires a nuanced, holistic approach. While targeted research that directly supports operational capabilities is undoubtedly valuable, history demonstrates that many of the most revolutionary military technologies originated from curiosity-driven, fundamental scientific inquiry. Seemingly abstract research can unexpectedly yield transformative breakthroughs that fundamentally reshape defense capabilities.

We urge policymakers to maintain a balanced research strategy that provides robust support for both applied technological development and open-ended scientific investigation. This comprehensive approach will be instrumental in sustaining the United States' technological leadership and ensuring the long-term adaptability of our defense innovation ecosystem.

Thank you for your prior commitments to a robust Defense S&T program; we hope that commitment will continue in the coming year. Please do not hesitate to contact us if CNSR can be of any service as the FY 2026 NDAA process advances.

Sincerely,

Coalition for National Security Research