EXHIBIT F

DECLARATION OF DR. GREG HIRTH

- I, Greg Hirth, declare as follows:
 - I am the Vice President for Research at Brown University ("Brown") in Providence, Rhode Island. I have held that position since February 4, 2025, after serving as interim Vice President for Research starting in September 2024. I am also a Professor of Earth, Environmental, and Planetary Science, and a federally funded researcher. I have been on the faculty at Brown since 2007.
 - 2. As Vice President for Research, I have personal knowledge of the contents of this declaration, or have knowledge of the matters based on my review of information and records gathered by Brown University personnel, and could testify thereto.
 - Brown is a major research institution that receives funding from the Department of Defense ("DOD"). This funding supports cutting-edge multi-year research projects across the University.
 - In fiscal year 2024, Brown received \$17.9 million in grants to support projects from many different offices within DOD.
 - 5. Brown intends to apply to DOD for new awards, and/or renewals and continuations of existing awards, in the next year and in future years.
 - 6. As of May 23, 2025, Brown has a total of 37 pending proposals for DOD grant funding, which includes proposals with Brown as a direct recipient and as a subrecipient. The total requested funding is over \$22 million. These proposals were budgeted on the understanding that Brown's negotiated indirect cost reimbursement rates would apply. In

the ordinary course, Brown would expect DOD to act on these pending proposals over the next several weeks and months.

- 7. The over \$22 million in total requested funding includes approximately \$6.3 million in indirect cost reimbursement. At an indirect cost recovery rate of 15%, the proposed indirect cost recovery would be reduced by more than \$4 million.
- 8. Applying such a reduction to Brown and other university awardees is unfairly restrictive on these institutions; while other types of institutions seek awards under the same DOD programs, the DOD's newly announced indirect cost reimbursement policy applies only to university awardees.
- The newly announced DOD 15% rate cap will make many, if not all, of Brown's proposed research projects infeasible relative to the entire scope of each project at the budget requested.
- 10. The DOD funding to Brown supports critical research vital to our nation's security both today and in the future, contributing to innovative solutions with strategic importance. America both depends on and benefits from this research.
- 11. Examples of these critical DOD-funded research projects include the following:
 - a. Research funded by the Office of Naval Research ("ONR") seeks to better understand how the brain uses feedback mechanisms to process visual information, and to use these insights to design the next generation of deep learning systems. By building artificial intelligence ("AI") models inspired by the brain's own mechanisms, the research aims to develop more efficient, flexible, and robust architectures for reasoning. These models will serve as "digital twins"

of the human brain—not only mimicking behavior, but also offering testable predictions about the brain's inner workings.

- b. Research funded by the Defense Advanced Research Projects Agency works to identify computer security weaknesses that pose fundamental threats to U.S. government, industry, and private individuals. New computer programming technologies like the Rust programming language are vital to improving system security. However, their strength comes from their complexity, making them difficult to adopt. This project is actively working on innovative methods to make the most difficult aspects of Rust accessible to a broader range of programmers, resulting in improved security.
- c. Research funded by ONR develops foundational new mathematics for the analysis of random interacting processes on large-scale networks with varied topologies. Such processes model phenomena in a wide range of disciplines including machine learning, statistical physics, engineering, computer science, and operations research. The developed theory will provide key insight into the dependence of critical phenomena such as phase transitions on network structure and enable better prediction and control, as well as efficient design, of next generation cyber networks, computer networks and neural networks. This research also has the potential to improve security efforts that involve advanced computational analysis.
- d. Research funded by ONR supports the development of new approaches to treat military wound infections. Military wounds are highly susceptible to infection by biofilm forming bacteria, which is a major cause of morbidity and mortality for

those who suffer from these wounds. This project is developing bacteriaresponsive antibiofilm nanoparticles that can disperse the biofilm matrix and eradicate these infections, significantly improving outcomes for wounded military personnel.

- e. Research funded by the ONR Defense University Research Instrumentation Program supports new in-situ deposition and measurement equipment for solidstate battery research. This instrumentation will aid in the study of battery materials and devices under specific environmental conditions to improve understanding of materials properties and interfacial phenomena, ultimately leading to advancements in undersea energy storage technology. This research has the potential to provide innovative solutions with strategic importance.
- 12. Reimbursement of Brown's indirect costs is essential for supporting this research. DOD's proposal to cut indirect cost rates to 15% for new awards would end or seriously jeopardize research projects like those described in paragraph 11, as would a 15% rate cap on renewals and existing awards.
- 13. Brown receives research funding from various federal agencies, including DOD, in various forms, including grants and cooperative agreements, which normally provide for the recovery of certain indirect costs at contractually negotiated rates. Overall, in the 2024 fiscal year, Brown's federally sponsored research activity totaled \$253.6 million, or 19% of Brown's operating revenue. Of that \$253.6 million, \$69.6 million was reimbursement of indirect costs. In the current 2025 fiscal year, Brown's operating budget projects \$300 million in all sponsored research (federal and non-federal), which represents 17% of Brown's operating revenue and anticipates \$73 million in indirect costs from federally

sponsored projects. As a result, the propagation of caps on indirect cost reimbursement rates across federal grant-making agencies has potentially huge consequences for Brown.

- 14. Indirect costs support critical infrastructure throughout the University that is necessary to perform cutting-edge research—including information technology, facilities operations and maintenance, finance, and human resources, as well as other aspects of general administration.
- 15. Physical facilities costs are one of the largest components of indirect costs. This includes not only the usual costs of constructing and maintaining buildings where research occurs, but the very high costs of outfitting and maintaining specialized laboratory space, which can require advanced HVAC systems, and specialized plumbing, electrical systems and waste management, as well as specialized laboratory equipment and research computing.
- 16. In addition, indirect costs fund the administration of awards, including staff who support Brown's compliance with federal regulations, including DOD regulations. These staff support many functions, including promoting research integrity; properly managing and disposing of chemical agents and other materials used in research; managing funds; providing cybersecurity, data storage, and computing environments required for certain types of data; ensuring compliance with specialized security protocols and safety standards; maintaining facility accreditation and equipment calibration to meet research quality and security standards; and preventing financial conflicts of interest.
- 17. Recovery of Brown's indirect costs is based on predetermined rates that have been contractually negotiated with the federal government. Through fiscal year 2027, the predetermined indirect cost rate is 59.5% for organized (on campus) research activities.

- 18. The effects of a reduction in the indirect cost rate would be devastating. Setting the overhead rate for DOD-sponsored grants and contracts to 15% would disrupt Brown's research initiatives, operating budgets, personnel, core infrastructure, and communities, all of which depend upon the current rate of indirect cost recovery.
- 19. If the indirect cost reimbursement of Brown's DOD sponsored grants and contracts had been reduced to 15%, the loss for fiscal year 2024 would have exceeded \$2.7 million. Brown estimates the loss for fiscal year 2025 would be approximately \$3 million based on year-to-date expenditures.
- 20. Grant awards are factored into Brown's multi-year financial plan, so any reduction in indirect cost rates will have a significant effect on Brown's multi-year planning and long-term strategic decision-making. These funds are critical as Brown weighs making capital and other infrastructure investments that support Brown's research mission.
- 21. Even more immediately, a reduction in the indirect cost rate to 15% for new awards, coupled with a requirement to accept a reduced indirect cost rate in renegotiation of existing grants, would require Brown to move very quickly to adjust its operations to absorb the loss of millions of dollars of expected revenue. That would include eliminating positions that support the research enterprise and facilities, such as administrators, research coordinators, lab managers, and security officers. This would significantly hamper Brown's ability to continue with critical research projects, and in turn jeopardize its ability to contribute to the nation's security. Moreover, recruiting staff who have the requisite knowledge and experience to work on such projects is exceedingly difficult. Even if funding were later restored, it would not be easy to identify and hire qualified individuals to fill these positions.

- 22. If Brown's DOD awards are terminated for failure to accept the new indirect cost rate cap in a renegotiation, the harms described above would be exacerbated.
- 23. A reduction in the indirect cost rate or total termination of DOD awards would also threaten Brown's ability to train and retain the next generation of engineers, mathematicians, physicists, and chemists. If Brown's DOD awards are terminated, graduate students will have to stop their work, which would hinder their degree completion. This would negatively affect Brown's workforce and ability to be competitive in fields critical for our nation's security.
- 24. Stopping or slowing DOD-funded research not only impedes work in specific fields, but also necessarily causes America to lose its global competitive edge in areas such as AI, microelectronics, advanced functional materials, and quantum science—today and in the future.
- 25. Importantly, Brown cannot make up for the gap in funding resulting from DOD's announced cut to indirect cost reimbursement, because research is already highly subsidized by the University. Brown's full cost of research is significantly more than what is covered by sponsored direct costs and indirect cost recovery. In the 2024 fiscal year, for example, Brown's full cost of research was approximately \$395 million, which was about \$100 million more than sponsored direct costs (\$224 million) and indirect costs (\$70 million) received from the federal government. Because Brown's federal awards do not provide for reimbursement of administrative costs in excess of 26%, all of Brown's administrative costs above 26% go unrecovered and are thus fully subsidized by the University.

- 26. It has been suggested that Brown use its endowment to make up for these lost federal funds. The endowment provides an essential source of support for Brown's financial aid, faculty salaries, and academic and co-curricular programs and consists of over 3,800 unique funds given as charitable gifts by alumni, parents, students, and friends of the University and subject to contractual limits on use. These are restricted by law and purpose for their designated use, and cannot simply be reallocated.
- 27. The purpose of Brown's endowment is to support the mission of Brown in perpetuity. It is managed with a dual mandate to balance the competing demands of current operations and preserve purchasing power to support future operations.
- 28. Brown's annual endowment payout, or the amount distributed from the endowment to support each fund's designated purpose, is between 4.5% and 5.5% of the endowment value's 12-quarter trailing average, as approved by Brown's Corporation. Brown's current endowment payout is set to 5.5%, the highest payout currently allowed. Because all endowments are legally subject to the Uniform Prudent Management of Institutional Funds Act ("UPMIFA"), Brown's ability to increase this annual payout beyond the Corporation-approved range is limited. In short, Brown's endowment cannot make up for the significant gap in funding a reduction in indirect cost reimbursement or total termination of DOD awards would create.
- 29. Without the opportunity to conduct DOD-funded research that will be negatively affected by the announced cut to indirect cost reimbursement, skilled faculty will opt to leave Brown, and likely the United States, in pursuit of viable work. This brain-drain will inevitably lead to lost opportunities to develop U.S. competitiveness, advance American

security and military science, create U.S. startup companies, and develop a workforce critical for the science and technical priorities of the current administration.

30. Accordingly, implementation of DOD's announced cut to indirect cost reimbursement will significantly and immediately compromise scientific advancement in numerous areas critical to the public interest and the advancement of key areas for American global competitiveness and security.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 13, 2025, at Providence, Rhode Island.

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Greg Hirth, PhD Vice President for Research Brown University