



July 3, 2023

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Via Electronic Mail: PRComments@doc.gov

Re: OMB Control No. 0693-0090 (88 FR 28516)

On behalf of the Association of American Universities, the Association of Public and Land-grant Universities, the Association of American Medical Colleges, the American Council on Education, AUTM, and COGR, we appreciate the opportunity to provide comments on the above-referenced Agency Information Collection Activities Submission to OMB for Review and Approval regarding the Interagency Edison (iEdison) System. Our member universities represent a significant portion of the academic research enterprise and recipients of federal research funding subject to the reporting requirements of the Bayh-Dole Act.

Our associations have historically strongly supported the redesign of the iEdison invention reporting system and have advocated for the expansion of the system to all federal agencies. In our [2018 comments](#) on the NIST Request for Information, we discussed the burdens to our member institutions caused by the widely different invention reporting requirements of federal agencies and the great need for harmonization of those requirements. Both our [January 2020](#) [April 2021 comments](#) on the NIST 37 CFR Parts 401 and 404 Notice of Proposed Rule-Making stated that we “have consistently advocated for a requirement for all agencies to use iEdison.”

Uniformity of invention reporting requirements would be helpful in significantly reducing the burden of compliance on our institutions and would allow for a more complete picture of Bayh-Dole compliance, as well as the commercialization of subject inventions and the licensing environment. Collection of this information has strategic value and practical utility for both NIST and agencies that award federal funding. The interagency working group decision mentioned in the ICR, to amend and expand on compliance questions, is also a step in the right direction of use of iEdison by all federal agencies, which we have strongly supported as indicated previously. We also agree that collection of gender information would be useful for multiple purposes, both for federal agencies and for external stakeholders in the invention and licensing landscape.

For these reasons we recommend OMB approval of the ICR. NIST implementation of the redesigned iEdison system has been effective and helpful, and we strongly support its further expansion and improvement.

The Association of American Universities (AAU) is an organization of 71 leading U.S. and Canadian public and private research universities on the leading edge of innovation, scholarship, and solutions that contribute to scientific progress, economic development, security, and well-being.

The Association of Public and Land-grant Universities (APLU) is a research, policy, and advocacy organization with a membership of over 251 public research universities, land-grant institutions, state university systems, and affiliated organizations in the U.S., Canada, and Mexico, that is dedicated to strengthening and advancing the work of public universities.

The Association of American Medical Colleges (AAMC) is a not-for-profit association dedicated to transforming health through medical education, health care, medical research, and community collaborations. Its members are all 157 accredited U.S. and 13 accredited Canadian medical schools; more than 400 teaching hospitals and health systems, including Department of Veterans Affairs medical centers; and more than 70 academic societies.

ACE is the American Council on Education, the major coordinating body for American higher education. Its more than 1,700 members reflect the extraordinary breadth and contributions of public and private colleges and universities. ACE members educate two out of every three students in accredited, degree-granting U.S. institutions.

AUTM is the non-profit leader in efforts to educate, promote and inspire professionals to support the development of academic research that changes the world and drives innovation forward.

COGR is an association with over 200 research universities and affiliated academic medical centers and research institutes. COGR concerns itself with the impact of federal regulations, policies, and practices on the performance of research conducted at its member institutions.