



August 3, 2026

Ms. Maureen O'Reilly
Management Analyst
National Institute of Standards and Technology
100 Bureau Drive, MS 1710
Gaithersburg, MD 20899

Submitted Electronically at PRANIST@nist.gov

RE: Comments on iEdison System

Dear Ms. O'Reilly:

We write to offer comments in response to the National Institute of Standards and Technology's Notice regarding the information collection associated with iEdison reporting compliance and request for comment ([OMB Control Number 0693-0090](#)).

COGR is the national authority on federal policies and regulations affecting U.S. research institutions. We provide a unified voice for over 230 research universities and affiliated academic medical centers and research institutes. Our work strengthens the research partnership between the federal government and research institutions and furthers the frontiers of science, technology, and knowledge. We advocate for effective and efficient research policies and regulations that maximize and safeguard research investments and minimize administrative and cost burdens.

AUTM is the non-profit leader in technology transfer, representing more than 3,000 technology transfer professionals at universities, research centers, and hospitals. Our members turn basic scientific discoveries into the life-saving medicines, transformative technologies, and advanced computing engines of tomorrow. This commercialization ecosystem—built on the foundational framework of the Bayh-Dole Act—relies on regulatory stability, long-term predictability, and efficient agency partnership.

Our organizations strongly support effective stewardship and commercialization of federally funded inventions. For more than forty years, the Bayh-Dole Act ("Bayh-Dole") has provided the framework for translating federally funded research into new medicines, diagnostics, medical devices, software, agricultural innovations, advanced materials, energy technologies, and countless other products that benefit the public and strengthen the U.S.

economy. According to published data from AUTM¹, U.S. universities and research hospitals annually disclose tens of thousands of new inventions, execute thousands of licensing agreements, and help launch hundreds of startup companies, resulting in products that generate billions of dollars in economic activity. These accomplishments result not only from federal research funding, but also from significant institutional investments in technology transfer offices and a compliance infrastructure by our member institutions. We appreciate and support many of the goals described in the abstract of the Notice. However, we caution against overweighting iEdison data in the calculation of the “return on investment” from federal funding or as a measure of a successful research program. The path from federally funded research to societal impact is rarely linear and often spans many years, if not decades. Research results and the patents arising from that research typically require substantial additional development, investment, testing, and refinement before they are introduced into the marketplace. In many cases, individual research projects do not directly produce a technology but instead generate the knowledge that enables subsequent discoveries and breakthroughs that lead to new technologies and products that ultimately improve human health, strengthen our country’s national security, and enhance the U.S. economic competitiveness.

The Notice provides estimates of 1.25 hours for an Invention Record, 0.75 hours for a Patent Record, and 25 minutes for a Utilization Record. The Notice does not, however, clearly explain the methodology or assumptions used to establish these estimates or precisely define what constitutes a “response” for each record type. The categories used in the Notice describe types of records rather than discrete reporting transactions, and each record may require multiple actions over the life of an invention or patent. Without clarification of this information, respondents cannot meaningfully evaluate whether the estimates accurately reflect the actual time required to comply. Transparency regarding the data and methodology would allow affected institutions to assess whether the estimates are reasonable and to provide more meaningful feedback.

Fundamentally, COGR and AUTM believe the burden estimates accompanying this information collection severely underestimate the administrative effort required of U.S. research institutions to comply with federal invention reporting requirements. In addition, the estimates do not account for the substantial compliance activities institutions undertake to satisfy agency-specific reporting requirements, supplemental data requests, and duplicative reporting obligations that extend beyond the standardized Bayh-Dole reporting framework

Recognizing the need for a more consistent, government-wide approach, Executive Order 14104, *Federal Research and Development in Support of Domestic Manufacturing and United States Jobs*, directed federal agencies to take steps to transition Bayh-Dole compliance activity (e.g., invention disclosure, election of title, reporting of patent activity, and utilization reporting) to iEdison by December 31, 2025. Although this initiative was intended to streamline Bayh-Dole compliance, the 2026 Government Accountability Office

¹ AUTM, [FY 2025 U.S. Academic Innovation Metrics Infographic \(2025\)](#)

(GAO) review of federal implementation of the Bayh-Dole² found that agencies continue to rely on a variety of reporting mechanisms and have not fully harmonized their reporting requirements. As a result, institutions often must submit duplicative reports or provide supplemental information outside of iEdison, thereby requiring multiple reporting workflows, additional data collection and validation, and significant institutional coordination.

The Department of Defense's DD Form 882 (Report of Inventions and Subcontracts) illustrates this burden. Although subject inventions are reported through iEdison in accordance with Bayh-Dole, DoD also requires contractors to prepare and submit DD Form 882 during award closeout, requiring substantially the same information to be reported through a separate process. In addition, many Defense Advanced Research Projects Agency (DARPA) agreements further require separate uploads of the same information to the DARPA Vault. Other federal agencies similarly require, as part of their contract closeout process, that information reported through iEdison be resubmitted through separate contracting systems. Preparing these duplicative reports requires coordination among technology transfer offices, sponsored research administrators, principal investigators, legal counsel, and compliance personnel to ensure consistent reporting across multiple federal systems.

Similarly, the Department of Energy requires recipients to provide supplemental commercialization information beyond the utilization data already reported through iEdison, including information regarding U.S. manufacturing, companies involved, jobs created, and manufacturing timelines. Collecting, validating, and reporting these additional data elements, often years after an invention has been disclosed or licensed, creates additional administrative obligations that are absent from the current burden estimate.

These examples illustrate that compliance with federal invention reporting requirements extends well beyond submitting information through iEdison. Institutions must manage multiple reporting processes, respond to agency-specific requirements, collect and validate additional information, and coordinate across numerous institutional offices to ensure accurate and consistent reporting. At the same time, agencies must consolidate data from iEdison and other reporting systems to obtain a complete record of compliance activity.

The growing use by federal funding agencies of Other Transaction Authority (OTA) agreements illustrates the additional complexity created by this fragmented reporting environment. Unlike grants, cooperative agreements, and most procurement contracts, OTAs are not automatically subject to the Bayh-Dole Act, and the intellectual property terms – including invention disclosure, election of title, reporting timelines and even reporting mechanisms – are instead established by the individual agreement.

² U.S. Government Accountability Office, *Technology Transfer: Funding Recipients Keep Most Federally Funded Inventions, but Some Cited Reporting Challenges*, GAO-26-107971 (Apr. 13, 2026), available at <https://www.gao.gov/products/gao-26-107971>

While some OTAs do incorporate Bayh-Dole or similar reporting requirements and permit reporting through iEdison, a significant number of OTAs contain agency-specific reporting requirements and procedures. As a result, institutions must navigate differing obligations across agreements, and when OTAs use timelines that differ from standard Bayh-Dole requirements, iEdison may generate erroneous error messages or notifications. In other cases, agencies require duplicative reporting directly to designated agency officials in addition to, or instead of, reporting through iEdison. If NIST expands iEdison to accommodate additional agreement types, including OTAs without traditional Bayh-Dole terms, it should ensure those additions are implemented in a manner consistent with existing requirements and do not create new administrative burdens. Where reporting requirements differ from statutorily required Bayh-Dole timelines, iEdison should apply those differences appropriately rather than generating conflicting or misleading notifications.

COGR and AUTM therefore encourage NIST to work with participating agencies to establish, to the greatest extent practicable, consistent terminology, workflows, validation requirements, notifications, and compliance expectations. Where differences among agencies or agreement types are legally or programmatically necessary, those differences should be clearly identified and incorporated into the system in a manner that minimizes agency-specific exceptions.

Consistency should also extend beyond the iEdison interface to the federal personnel responsible for administering, reviewing, and auditing compliance through the system. NIST should establish appropriate training for agency personnel who use iEdison so that they have a consistent understanding of applicable reporting requirements, system functionality, error notifications, and compliance expectations. Recipients should not receive materially different guidance or compliance determinations based solely on which federal agency is reviewing the same type of record. Consistent training and administration would reduce unnecessary back-and-forth between recipients and agencies, minimize conflicting instructions, and improve the reliability and usefulness of the information maintained in iEdison.

Conclusion:

Our two organizations support NIST's continued efforts to improve iEdison and advance a centralized, government-wide reporting system. A truly standardized approach would reduce unnecessary administrative burden, improve data quality, enhance federal oversight, and provide recipients with a consistent reporting experience across federal agencies while allowing research institutions to devote more resources to innovation and commercialization.

Accordingly, we respectfully urge NIST to revise the burden analysis accompanying this information collection to reflect the full scope of institutional compliance activities and to clarify the definition of record type and the methodology for calculating the estimated time to complete each transaction. Specifically with respect to the analysis, the estimates should

account for the time and resources associated with duplicative agency reporting requirements, supplemental information requests, and the internal coordination necessary to satisfy multiple federal reporting obligations beyond the standardized iEdison submission. If NIST expands iEdison to accommodate additional agreement types, NIST should also ensure that the system, its reporting requirements, and its administration are implemented consistently across all participating agencies. This should include appropriate training for federal personnel who use iEdison to assist recipients or to review and audit compliance, along with standardized system terminology, workflows, validation requirements, notifications, and compliance expectations across participating agencies. These measures are necessary to ensure that expansion of iEdison reduces, rather than inadvertently increases, the administrative burden on recipients.

Sincerely,



Matt Owens
President
COGR



Stephen J. Susalka
Chief Executive Officer
AUTM