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August 3, 2026

VIA EMAIL TO PRANIST@nist.gov

Maureen O'Reilly
Management Analyst
NIST
100 Bureau Drive, MS 1710
Gaithersburg, MD 20899

Re: Comment Request for iEdison System
Published Document: 2026-10947 (91 FR 32951)
OMB Control Number 0693-0090

Dear Ms. O'Reilly,

Please accept these comments in response to the subject request.

We are writing on behalf of UM Ventures, College Park, the technology transfer office for the University of Maryland, College Park ("UMD"). One of our responsibilities is ensuring UMD's compliance with its obligations under the Bayh-Dole Act and additional intellectual property ("IP") compliance requirements of our funding agreements.

UMD processes 170-190 new IP disclosures each year, half of which are subject inventions of federal awards. UMD had \$717.5M in research expenditures in FY25. Of the federal funding UMD receives, most comes from DoW, NASA, NSF, HHS, Commerce (including NIST), USDA, and DOE. In addition to working with almost every agency, at any given time we have 200+ active licenses for ~400 unique IP matters and provide support for thousands of individual inventors.

We appreciate changes and improvements to iEdison since NIST launched the current system and, as regular users, we look forward to being able to contribute input for system and process improvements.

Regarding NIST's requests to permit it to conduct the following items listed, our comments are below in blue:

- (a) Evaluate whether the proposed information collection is necessary for the proper functions of the Department, including whether the information will have practical utility;

Collecting accurate information on the time burden for iEdison users to comply with requirements is critical for ensuring that iEdison continues to meet the needs of users and agencies.

- (b) Evaluate the accuracy of our estimate of the time and cost burden for this proposed collection, including the validity of the methodology and assumptions used;

The estimated times provided in the notice (*Invention Records*: 1.25 hours, *Patent Records*: .75 hours, *Utilization Records*: 25 min) do not align with the reality of time involved to collect information and submit in a format which will not trigger error notifications. The estimated times provided in the notice also do not reflect the time needed to clear error notifications, especially for information previously disclosed and accepted by the funding agency prior to the current iteration of iEdison and/or testing/implementation of internal AI tools being used by internal agency reviewers. The estimated times provided also do not reflect additional time needed to coordinate reporting obligations with joint owners and manage reporting obligations when inventions are made with multiple sources of funding. We would appreciate transparency into the methodology for coming up with these time estimates and would be pleased to contribute data to actual time involved for users.

- (c) Evaluate ways to enhance the quality, utility, and clarity of the information to be collected;

We suggest improved or advanced communication from NIST to users when new internal tools are under evaluation/used to screen old, previously accepted, submissions for errors. Agency staff should also receive sufficient training and resources to review AI-generated information so that false error notices are not generated and that time for complying does not increase. E.g., our compliance staff spends a significant amount of their time re-uploading previously accepted invention disclosures for inventions disclosed and title waived more than a decade ago or submitting comments in response to an error notice because the record is locked for us to make changes since we previously waived title.

Agency expectations could also be shared with users in a more formalized format, e.g., iEdison training where users would then receive a certification for having completed the training.

- (d) Minimize the reporting burden on those who are to respond, including the use of automated collection techniques or other forms of information technology.

Having a single platform for reporting to all agencies in a consistent way would ease the burden on reporters. Anything which encourages consistent use by agencies - whether field updates or internal training - would ease reporting burden on users. We appreciate efforts to add an integration of the domestic manufacturing waiver form into the iEdison system, additional patent application types, and additional agreement types. Ensuring that fields

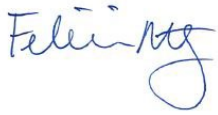
and user interfaces are updated and easy-to-use helps improve compliance. However, NIST should ensure that iEdison requirements remain aligned with actual requirements for its users, specifically that iEdison reporting required for university/non-profits remain consistent with actual Bayh-Dole requirements and not add requirements outside of Bayh-Dole e.g., DOE-specific requirements for utilization reporting for for-profit entities.

The following are examples of additional reporting requirements outside of Bayh-Dole requirements which add significant time and burden for reporters:

- Submission and updating of DD-882 forms to DoW agencies, often by email to varying individual recipients, at interim and close-out periods of award, when disclosing new subject inventions, and when changing the title disposition for subject inventions.
- Tracking non-standard reporting and title election time periods and non-Bayh-Dole commercialization requirements included in OTA funding agreements.

We appreciate NIST's efforts to enhance iEdison's capabilities, but please ensure that the time burden estimates used to make decisions are corrected and that enhancements do not increase compliance burden on users.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Felicia Metz".

Felicia Metz, Esq.
Director
UM Ventures, College Park
University of Maryland