

July 5, 2023

NIH Office of Policy for Extramural Research Administration
National Institutes of Health.
9000 Rockville Pike, Bethesda, MD 20892

RE: National Institutes of Health Updated Policy Guidance for Subaward/Consortium Written Agreements

The American Society for Biochemistry and Molecular Biology is an international nonprofit scientific and educational organization that represents more than 10,000 students, researchers, educators and industry professionals. The ASBMB strongly advocates for strengthening the science, technology, engineering and mathematics workforce, supporting sustainable funding for the American research enterprise and ensuring diversity, equity and inclusion in STEM.

The ASBMB is deeply concerned about the [proposed changes to the NIH Grants Policy Statement](#) requiring any foreign sub-recipients to provide copies of all lab notebooks, all data and all documentation that supports the research outcomes described in the progress report to the prime recipient of the award with each scientific update every six months.

This proposed change in policy would significantly increase the administrative burden placed on principal investigators and dissuade PIs from collaborating with foreign entities. Administrative workloads placed on federally funded scientists interfere with the conduct of scientific research and the teaching and training of the next generation of scientists. [PIs already spend, on average, 42% of their time](#) on associated administrative tasks, yielding a significant loss of research time. Adding an erroneous burden of reviewing all materials every six months from any foreign collaborator is going to place undue stress and time constraints on PIs who are already struggling.

Scientific innovation requires a diversity of thought, disciplines and experiences—which is why science is inherently international and thrives on diversity. For example, science and engineering articles produced with international collaboration represent [23% of all articles published between 2008 and 2018](#), and international collaborations have been shown [to increase the impact of research](#), as measured by citations. Adding a policy that increases administrative burden will substantially dissuade researchers from collaborating with researchers or institutions in foreign countries, which will only harm the research enterprise. While the ASBMB acknowledges there have been complications with a few selected foreign collaborators, this policy is inherently unequal and urges the NIH to modify it, so research integrity is protected in all subcontracts, not just those with foreign collaborators.

To mitigate research security risks without increasing administration burden and dissuading international collaboration, the ASBMB suggests a requirement that all lab notebooks, all data and all documentation be made available to the PI upon written request for all sub-recipients. The ASBMB thanks the NIH for leading the scientific community through new challenges while upholding research integrity.