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Dr. Walter G. Copan
National Institute of Standards and Technology
U.S. Department of Commerce
100 Bureau Drive
Gaithersburg, MD 20899

Dear Director Copan:

I write on behalf of Yale University to express my appreciation for the Administration's efforts to support and encourage the transfer of federally sponsored research into the commercial sector through its *Return on Investment Initiative for Unleashing American Innovation*. In particular, we applaud the recently released draft "Green Paper" (NIST Special Publication 1234), which we are pleased to note incorporates many of the comments and recommendations of research universities and technology transfer managers.

In general, Yale endorses the more extensive comments and recommendations submitted by the Association of American Universities (AAU), the Association of Public & Land-grant Universities (APLU), the Association of American Medical Colleges (AAMC), the Council on Government Relations (COGR), and the Association of University Technology Managers (AUTM) and specifically those relating to the critical importance of the Bayh-Dole Act to our technology transfer activities. In addition, we want to underscore our support for several Intended Actions in the Green Paper.

As discussed in Yale's response to the NIST RFI, we support the core concepts behind the conflict of interest regulations and policies, but the 2011 revisions have inhibited commercialization and imposed significant costs on universities, and have not materially improved objectivity in research. Harmonized, government-wide requirements for managing conflicts of interest, as proposed in the Green Paper, have the potential to better protect research integrity while promoting the commercialization of federally sponsored research. Also, as discussed previously, we support the Green Paper's Intended Action to clarify the interpretation and use of march-in rights under the Bayh Dole Act, which, if thoughtfully crafted, will ensure that early stage technologies will continue to be developed and made available to meet the needs of the American people while preserving the government's march-in rights in the event of a threat to public health or safety. Finally, we agree that there would be considerable benefit to the creation of a modern, unified platform for reporting data on intellectual property that is the result of federal research support, consistent with government-wide reporting obligations.

We greatly appreciate NIST's leadership in this multi-agency effort to improve technology transfer at universities and national laboratories. We look forward to future opportunities to comment as NIST and others implement their Intended Actions.

Sincerely,

A handwritten signature in black ink, appearing to read "Pete Schiffer", written in a cursive style.

Peter Schiffer