Dear NIST,

Please find below the UNC-Chapel Hill response to your recent "RFI" request. This work is critical to advancing the impact of "fundamental research" which can lead to new technologies and products that have significant impact to our society.

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[http://innovate.unc.edu/](https://na01.safelinks.protection.outlook.com/?url=http%3A%2F%2Finnovate.unc.edu%2F&data=02%7C01%7Ccourtney.silverthorn%40nist.gov%7C4e173204fe8f4b5a503c08d5f64e54be%7C2ab5d82fd8fa4797a93e054655c61dec%7C1%7C1%7C636685738644354466&sdata=Rx1JqW%2F7Rzo6W%2F1IKt7pViuIg8kQNr8%2FcVPHFTiV%2BBA%3D&reserved=0)  |  twitter – @innovateunc and/or JudithCone  |  facebook – innovate@carolina

Dear NIST:

First, we fully support and affirm the recommendations put forth in the AAU/APLU/COGR and AAMC response document.  In addition, we want to reinforce their comments with the points below:

1. Technology transfer functions at universities must be adequately funded to execute their responsibility to establish Intellectual Property, assist faculty in advancing technology that is attractive to potential commercial partners and developing ecosystems that support new business development.
2. Funding for technology transfer must be built into university budgets as a critical line item in order to assure resources available to advance discoveries in the translational stage.
3. We support the idea to establish a GAP early stage proof of concept/translational targeted federal funding program that is incremental to the current SBIR/STTR program. Such a program would build a stronger translational element to the fundamental research that exists at universities and would drive more interest by businesses in university technology assets. We emphasize that new suggested funding should not take a way from existing NIH/NSF programs. We don't recommend a zero sum game. Maybe a new Commerce Department funding program could be developed.
4. It is important to maintain strong and balanced support between local funding sources, university startup funding programs and traditional government grant programs.
5. Regulatory relief: Make changes to conflict of interest regulations to help streamline the process of clearing and managing conflicts in situations where research is expected to yield technologies that can be commercialized. Holding a forum to develop new approaches to managing COI that protects all academic, government and private interests would be a useful approach to generate new ideas to improve COI management.