



January 19, 2018

Dear Interagency Open Science Committee Members,

Thank you for attending COGR's Research Compliance and Administration (RCA) Committee meeting this past October. We understand the tremendous value data sharing offers the public and appreciate the ongoing dialogue we've had to help inform policy decisions. As we await the release of a Request for Information (RFI) and prepare for our February meeting, the RCA Committee asked that COGR follow-up in writing with additional considerations.

As you continue to work with the interagency committee on open science, we ask you continue to take the lead not only in policy but also with draft guidance allowing for feedback on remaining critical success factors such as data standards, federally funded data storage options, and specific considerations for how and what data is reported. On the subject of curation and length of storage, we recommend expanding funding for further research via funding opportunities to the research community. Allowing additional time and resources to conduct research for practicable solutions may address questions the scientific community continues to struggle with (e.g., cost, burden, resources, cost vs benefit, etc.) Given the speed of technological advances, curation, storage, and protection of human subject confidentiality will likely look much different in the years to come. Further research in these areas, with the ability to make modifications to existing repositories over time, could eventually help relieve burden on investigators, perhaps eliminating the need to develop Data Management Plans. In the short term, we suggest a ground-up approach similar to the National Science Foundation's, where a reasonable approach is developed by principal investigators who are closest to the scientific results with concurrence of program officers. Compliance with the plan is on a standard of "meets" versus "doesn't meet" basis for data supporting *publication* adhering to the OSTP guideline of February 2013. However, in the long term, we would like to see reasonable standardization of practices as case by case decisions will be expensive to maintain and makes it difficult to effectively share research data.

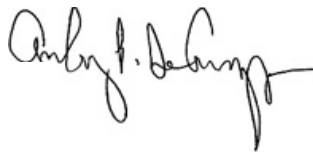
In terms of budgeting for these costs, we ask the Committee to bear in mind that the timing of paying for data sharing and management costs as direct costs from a sponsored project means it is currently not practical to adequately cover the costs from funded projects. As these charges generally occur at the very end of a project period or after the award period is over, even a pay-to-deposit repository is often outside of the accepted audit standards for cost timing. In addition, principal investigators are challenged to cover data archiving and storage costs with current projects and considering funding limitations; we feel strongly that these types of details must be sorted out for how data retention costs are to be funded without passing another unfunded mandate onto our member institutions. It is our view that if the data sharing is

deemed an important priority for the public, then the government should be responsible for developing, funding and maintaining the necessary data repositories.

Finally, we ask you to keep in mind that changes in public access means changes to institutional policies and procedures for record retention. Creation and modification to policies for private institutions must generally be approved by faculty senate and other boards/committees. Changes in record retention with public institutions will be state specific, both requiring lengthy reviews subject to approval by Boards of Trustees and state legislatures. While we recognize that scientists in certain disciplines have been sharing their data for years, the area of biomedical research is far more expansive. More time and research is needed in order to strike a suitable balance between what is impactful for the public and yet reasonable for our member institutions. With the currently growing list of regulations, compliance requirements continue to increase. This reduces researcher time dedicated to advancing knowledge and increases the administrative portion of every federal dollar allocated to supporting research. COGR supports ongoing pragmatic dialogue and the [AAU-APLU Report and Recommendations](#) as a means to progress in this area in advance of any major change in policy.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthony P. DeCrappeo". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Anthony P. DeCrappeo  
President