MEMORANDUM

TO: Sheila Garrity, J.D., M.P.H., M.B.A.
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DATE: October 23, 2023

RE: Request for Extension of Comment Period for Notice of Proposed Rulemaking on
    Public Health Service Policies on Research Misconduct

We deeply appreciate ORI’s efforts to review and revise the Public Health Service Policies on
Research Misconduct based “on the experience that ORI and institutions have gained” since the
regulations were published in 2005. The proposed changes to the research misconduct regulations
are extensive in number and magnitude, and they will substantially impact our member
institutions’ policies and processes for handling allegations of research misconduct. Yet the
NPRM affords the regulated community only 60 days to review the changes; compare them with
existing requirements; discuss their meaning and impact with researchers, RIOs, and persons
responsible for their implementation; and develop and draft comments. Additionally, the
Thanksgiving Day holidays will impede the ability to conduct these review activities, thus further
curtailing the comment period.

1 88 FR 69583
These are the first major revisions to the research misconduct regulations that research institutions have seen in 18 years, and they deserve nothing less than a detailed analysis by members of the regulated community. To permit the regulated community to conduct this vital review, including an analysis of cost impacts, we respectfully request that ORI consider extending the comment period for an additional 45 days that would end on January 19, 2024.

We thank ORI in advance for its consideration of this request, and we look forward to a favorable response.