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Elisa A. Hurley, PhD

March 8, 2022

Dr. Ryan Donohue

Office of Science and Technology Policy

Executive Office of the President

Eisenhower Executive Office Building

1650 Pennsylvania Avenue, NW

Washington, DC 20504

Re: Request for extension of the comment period for the Request for Information to support the development of a federal scientific integrity policy framework

Sent via electronic mail to ScientificIntegrityRFI@ostp.eop.gov

Dear Dr. Donohue:

Public Responsibility in Medicine and Research (PRIM&R) commends the effort undertaken by the Office of Science and Technology Policy (OSTP) to develop a federal scientific integrity policy framework. The Request for Information (RFI) published in the *Federal Register* on March 3, 2022, is not only timely but also clearly illustrates the complex nature of issue. However, we have serious concerns that the short 30-day comment period precludes the research community from being able to provide substantive comments.

PRIM&R is a nonprofit organization dedicated to advancing the highest ethical standard in the conduct of research. Since 1974, PRIM&R has served as a professional home and trusted thought leader for the research protection community, including members and staff of human research protection programs and institutional review boards (IRBs), investigators, and their institutions. Through educational programming, professional development opportunities, and public policy initiatives, PRIM&R seeks to ensure that all stakeholders in the research enterprise understand the central importance of ethics in the advancement of science.

The RFI seeks input on four substantive areas including: (i) ensuring that scientific integrity policies adequately address emerging social issues (e.g., diversity, equity, and inclusion) as well as emerging issues in science and technology (e.g., emerging digital and other technologies, citizen science, open science, etc.); (ii) criteria for evaluating scientific integrity policies; (iii) mechanisms and processes to ensure that policies evolve in response to emerging issues; and (iv) mechanisms to ensure

the viability and durability of federal scientific integrity through changes in government and cultural shifts.

PRIM&R believes that each of these four areas are extremely important and warrant deep deliberation and consideration by all stakeholders in the federal scientific enterprise. Thus, PRIM&R requests that the comment period be extended to 90-days (June 4, 2022) to ensure that all interested parties have ample opportunity to provide substantive and constructive information to guide the development of a federal scientific integrity policy framework.

We hope OSTP will honor our request and extend the deadline for submitting information. Thank you for your consideration and if you have any questions, please feel free to contact me by phone at (617) 423-4112 or e-mail at ehurley@primr.org.

Sincerely,

A handwritten signature in black ink that reads "Elisa A. Hurley". The signature is written in a cursive, flowing style.

Elisa A. Hurley, PhD
Executive Director

cc: PRIM&R Public Policy Committee, PRIM&R Board of Directors