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Re: PHS Research Performance Progress Report and Other Post-award Reporting (OD);
Federal Register / Vol. 87, No. 191 / Tuesday, October 4, 2022 [60183]

Thank you very much for the opportunity to offer comments on the PHS Research Performance Progress Report and Other Post-award Reporting (OD).

The Agency Notice states that “the application and progress report forms will be updated to align with this requirement. NIH is also introducing a new, optional Data Management and Sharing (DMS) Plan format page that applicants may use to develop their DMS Plan”. This update is part of the Public Health Service (PHS) Research Performance Progress Report and Other Post-award Reporting requirements (0925-0002 expiration date: 09/30/2024). Current policy requires that the original signed PHS 6031 be mailed to the agency, with the failure to do so resulting in an early termination of the award. With many of the research administrative offices continuing to operate remotely, or in a hybrid, model, this is an undue burden on employees who have to obtain signed copies of the original which requires the document to be mailed to their home address; making a copy for institutional record; and mailing the original to the agency through postal service with the pressure of ensuring this is completed within the required 60 days. It should also be noted that this requirement has been of particular burden during the COVID-19 pandemic where most institutions and administrative staff were operating fully remotely.

We request that as part of this review process the instruction be modified to clearly indicate that all documents may be submitted electronically.

Sincerely

A handwritten signature in blue ink, appearing to read 'A. Tahmassian', with a horizontal line underneath.

Ara Tahmassian