



OFFICE OF THE VICE PRESIDENT – RESEARCH AND INNOVATION

OFFICE OF THE PRESIDENT
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Submitted through: <http://www.reginfo.gov/public/do/PRAMain>

July 22, 2025

To Whom It May Concern:

RE: UC Response to Comment Request on NIH Electronic Application System for NIH Certificates of Confidentiality (CoC) [[90 FR 30652](#)]

On behalf of the University of California (UC) system, we write to express our strong support of the National Institutes of Health (NIH) continuing to issue discretionary Certificates of Confidentiality (CoCs), and of reinstating its electronic application system without changes.

Researchers engage in human subjects research across the ten UC campuses, its affiliated three national laboratories, and six academic health centers. As a leading public research institution with a robust human subjects portfolio, UC has benefitted significantly from NIH's issuance of discretionary CoCs. These protections are critical for safeguarding sensitive participant data in studies not otherwise covered under mandatory CoC issuance. Having a CoC for qualifying non-NIH-funded research is essential for supporting ethical research conduct, protects participant privacy, and strengthens public trust in research.

Additionally, the NIH electronic application system for requesting discretionary CoCs has functioned effectively and efficiently. In our experience, the system has been user-friendly, and the turnaround time for approvals has generally been swift, often within a few days. This responsiveness has been instrumental in minimizing delays in research while ensuring appropriate participant protections are in place.

We urge NIH and the Office of Management and Budget to support the continuation of discretionary CoCs and the reinstatement of the existing electronic CoC system. Doing so will maintain an important mechanism for upholding research integrity and participant confidentiality across a wide range of research.

Thank you for the opportunity to provide input.

Sincerely,

A handwritten signature in cursive script that reads "Agnes Balla".

Agnes Balla
Director
Research Policy Analysis & Coordination
University of California Office of the President

Cc: NIH-CoC-Coordinator@mail.nih.gov