

UC Office of the President

National Aeronautics and Space Administration (NASA)

Title

UC Request for a 60-day Extension to Submit Comments on NASA "New Conflict of Interest and Conflict of Commitment Policy for Recipients of NASA Financial Assistance Awards"

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OFFICE OF THE VICE PRESIDENT – RESEARCH AND INNOVATION

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Sent via email to christopher.e.murguia@nasa.gov

February 15, 2023

Christopher Murguia
Senior Analyst
National Aeronautics and Space Administration Headquarters
300 E Street SW, Rm. 5L32
Washington, DC 20546

RE: Request for 60-day extension to submit comments on NASA “New Conflict of Interest and Conflict of Commitment Policy for Recipients of NASA Financial Assistance Awards”

Dear Senior Analyst Murguia:

I write on behalf of the University of California (UC) system to request a 60-day extension (a total of a 90-day comment period) on NASA’s request for comment on the “New Conflict of Interest and Conflict of Commitment Policy for Recipients of NASA Financial Assistance Awards” (“COI/COC Policy”) published in the Federal Register on January 30, 2023.

We appreciate the effort that NASA is undertaking to address the U.S. Government Accountability Office’s recommendations in its report, *Federal Research: Agencies Need to Enhance Policies to Address Foreign Influence*. However, a 30-day comment period is inadequate to assess thoroughly the impact of the new COI/COC Policy. The UC system, comprised of ten research-intensive campuses, six medical schools, and three affiliated U.S. Department of Energy national laboratories, receives more than \$150 million annually from NASA across more than 500 awards. To compose thoughtful comments, we will need to consult with the investigators and staff directly affected by the proposed changes.

If you have any questions concerning these comments, please contact Timothy Miller, Research Policy Manager, at Timothy.Miller@ucop.edu.

Sincerely,

Deborah Motton, Ph.D.
Executive Director
Research Policy Analysis and Coordination
University of California, Office of the President