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February 20, 2025

NIH Office of Science Policy
9000 Rockville Pike
Bethesda, Maryland 20892

Re: NIH Plan to Increase Findability and Transparency of Research Results Through the Use of Metadata and Persistent Identifiers (PID)

Submitted online at https://osp.od.nih.gov/comment-form-nih-plan-to-increase-findability-and-transparency-of-research-results-through-the-use-of-metadata-and-persistent-identifiers-pids/

The Association of American Medical Colleges (AAMC) appreciates the opportunity to provide feedback to the National Institutes of Health (NIH) on the agency's plan to increase the findability and transparency of research results through the use of metadata and persistent identifiers (PIDs).

The AAMC is a nonprofit association dedicated to improving the health of people everywhere through medical education, health care, medical research, and community collaborations. Its members are all 158 U.S. medical schools accredited by the Liaison Committee on Medical Education; 13 accredited Canadian medical schools; nearly 500 academic health systems and teaching hospitals, including Department of Veterans Affairs medical centers; and more than 70 academic societies. Through these institutions and organizations, the AAMC leads and serves America's medical schools, academic health systems and teaching hospitals, and the millions of individuals across academic medicine, including more than 201,000 full-time faculty members, 97,000 medical students, 158,000 resident physicians, and 60,000 graduate students and postdoctoral researchers in the biomedical sciences. Following a 2022 merger, the Alliance of Academic Health Centers International broadened participation in the AAMC by 70 international academic health centers throughout five regional offices across the globe.

The AAMC strongly supports efforts to increase the findability of research outputs and promote transparency in the research process, as well as the ability for NIH to track the outputs of its investment in research. As previously noted in comments to the White House Office of Science and Technology Policy (OSTP)[1] and NIH[2], "Making these outputs more readily available advances science by enabling further validation of experimental results, facilitating reuse of hard to-generate data, catalyzing new research and scientific collaboration, and generally promoting more responsible

[1] AAMC Comments to OSTP. Request for Information: Public Access to Peer-Reviewed Scholarly Publications, Data and Code Resulting from Federally Funded Research (85 FR 9488). May 6, 2020. https://www.aamc.org/media/44641/download?attachment

[2] AAMC Comments to NIH. Re: NOT-OD-20-013: Request for Public Comments on a DRAFT NIH Policy for Data. Management and Sharing and Supplemental Draft Guidance. Jan. 10, 2020. https://www.aamc.org/media/40536/download?attachment.

stewardship of federal resources." We are pleased to offer the following comments to the NIH as it develops a policy for the use of PIDs and metadata.

I. Using and Submitting Metadata and PIDs

The use of ORCID as a unique, persistent identifier for researchers is a key step to improving the connectedness and findability of research outputs (as defined in the Plan, publications and scientific data). The AAMC has previously noted the critical importance of ORCID as part of its Credit for Data Sharing initiative, which is focused on linking researchers and organizations to shared datasets[3]. We also note the central role that ORCID plays in research security efforts and agency implementation of National Security Presidential Memorandum-33 (NSPM-33)[4], by strengthening the linkage and documentation between researchers and funding sources and allowing for easier tracking of any potential conflicts of commitment. NSPM-33 was issued in Jan. 14, 2021 by the Trump Administration, and the work initiated by OSTP during that time to carry out its implementation continues as initially envisioned.

To optimize the use of ORCID, we strongly encourage the NIH to work with ORCID to establish and maintain automated systems that populate publication and data metadata from PubMed Central and other NIH-supported repositories directly into researchers' ORCID profiles. Establishing a robust automated process would improve data integrity, reduce institutional and researcher burden, and maximize the NIH's role in process improvement. Additionally, NIH should work with other federal research agencies to promote a set of unified practices which would maintain ORCID profiles with trusted, authoritative information. Such coordination would strengthen the overall PID ecosystem and ensure that the NIH's requirement for ORCID is valuable to both the agency and the broader research ecosystem.

Finally, NIH should continue to produce guidance and trainings on the use of ORCIDs and any other selected PIDs and ensure that these are easily findable and usable. We also suggest that the agency continue to engage with institutions, particularly libraries and sponsored program offices, to understand the challenges which might arise from the use or implementation of ORCID or standardized metadata.

II. Collecting and Making PIDs and Metadata Publicly Available

The AAMC recognizes and supports the value of PubMed and PubMed Central (PMC) continued efforts to collect and make publicly searchable all available metadata submitted to PMC, including authors' names, affiliations, funding information, publication dates and DOI. We also appreciate efforts to utilize these same metadata fields across other NIH sites such as REPORTER and iCite, to further improve data linkage.

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[3] Pierce, H.H., et al. Credit data generators for data reuse. Nature 570, 30-32 (2019). https://doi.org/10.1038/d41586-019-01715-4

[4] Presidential Memorandum on United States Government-Supported Research and Development National Security Policy. Issued on: January 14, 2021. https://trumpwhitehouse.archives.gov/presidential-actions/presidential-memorandum-united-states-government-supported-research-development-national-security-policy/

AAMC recognizes the need for standardized metadata as a necessary component of effective research data sharing. As noted in previous comments to NIH on the draft scientific data sharing policy, and to OSTP[5] on the desired characteristics of research repositories, "In order for data to be successfully reused, it must not only be deposited in an appropriate repository, but also meet several other criteria, including adequate metadata, curation, and the use of common standards." We encourage NIH to work with community partners and repositories to inform best practices for metadata standards and curation, and to maintain a list of federally supported repositories which are available to NIH grantees.

III. Assigning Identifiers for NIH Awards and NIH-Conducted Research Projects

As NIH notes, PIDs are most useful when they can be linked in standardized ways, and we encourage NIH to collaborate not only with other federal agencies, but also with community organizations, institutions, and societies as it determines the most suitable PIDs for research awards and conducted research projects. Cross-stakeholder groups such as the Research Data Alliance and FORCE11 have already developed protocols and standards to be used for both PIDs and metadata that align with the FAIR[6] and TRUST[7] principles for data and repositories and should be utilized as a resource during this process.

We are very appreciative of the work NIH has undertaken to improve the findability and transparency of research products. The AAMC looks forward to continued engagement with NIH as the process of policy development progresses. Please feel free to contact me or my colleague Anurupa Dev, PhD, Director of Science Policy and Strategy (adev@aamc.org), with any questions about these comments.

Sincerely,

Elena Fuentes-Afflick, MD, MPH

Elena Fuentes-Afflick, MD, MPH
Chief Scientific Officer

cc: David J. Skorton, MD, AAMC President and Chief Executive Officer

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[5] AAMC Comments to OSTP Re: Request for Public Comment on Draft Desirable Characteristics of Repositories for Managing and Sharing Data Resulting from Federally Funded Research (85 FR 3085). March 10, 2020. https://www.aamc.org/media/42891/download?attachment

[6] FAIR Principles. https://www.go-fair.org/fair-principles/

[7] Lin, D., et al. The TRUST Principles for digital repositories. Sci Data 7, 144 (2020). https://doi.org/10.1038/s41597-020-0486-7