

Author Full Name : Jennifer Bloom

Received Date : 07/14/2025 12:21 PM

Comments Received :

I have experience dealing with the NIH Certificate of Confidentiality system, both as part of a funded research team, and in my current position as a university research administrator. I would recommend that the CoC E-application system be reinstated without change.

The CoC is essential for conducting research when participants may be engaged in illicit activity that is relevant to their health and wellbeing or to the health of the community. The paperwork burden associated with obtaining a CoC was greatly reduced by the changes with the 21st Century Cures Act, which automatically issues a CoC as part of NIH grant funding. However, we still occasionally deal with other funded research (SAMHSA, state funding) that also require a CoC. The current process is not a significant administrative burden because we make very few such requests in any given year, and the required information is pertinent to the Certificate.