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December 4, 2023

Deidre A. Harrison  
Deputy Controller  
Office of Federal Financial Management  
Office of Management and Budget

*Submitted via regulations.gov*

Re: Document Number: 2023-21078

Dear Ms. Harrison:

I am submitting this comment on behalf of [SPARC](http://www.sparcopen.org), a non-profit advocacy organization that supports systems for research and education that are open by default and equitable by design. Our [membership](#) includes over 250 academic and research libraries across the U.S., with institutions ranging from large research intensive universities to community colleges. We believe that sharing knowledge is a human right, and that everyone should be able to access, contribute to, and benefit from the knowledge that shapes our world.

Our comments offer recommendations on OMB's proposed updates to the Uniform Guidance related to the Unique Entity Identifier (Sections 25.100–25.200) and the Federal Purpose License (Section 200.315). We first offer a recommendation regarding the entirety of Sections 25.100 and 25.200 and then specific recommendations on individual subsections.

## **Part 25—Unique Entity Identifier and System for Award Management**

### Subparts A—General & B—Policy

[25.100–25.200] We recommend that the U.S. government develop a national strategy on the use of persistent identifiers (PIDs) to articulate how they can be leveraged in the U.S. research ecosystem and globally to support American science leadership. To begin this process, we suggest that OMB convene a working group to develop a national PIDs strategy, bringing together federal agencies, key actors in the research community, and technical experts. OMB can reference similar efforts in [Australia](#), [Canada](#), and the [United Kingdom](#) who have established structures (e.g., task forces, coordinating committees, etc.) to ensure research community

involvement and international coordination. Ultimately, we recommend that OMB develop guidance on the use of PIDs for entities receiving federal financial assistance.

### *Why are PIDs important?*

PIDs are digital identifiers that are globally unique, persistent, machine resolvable, have an associated metadata schema, identify an entity, and are frequently used to disambiguate between entities.<sup>1</sup> They are a key part of the digital infrastructure underpinning the global research ecosystem and offer opportunities for the federal government to more easily track and assess the impact of its investments in research. Beyond these benefits to the federal government, PIDs can also reduce burden on researchers and institutions by making it easier to track and discover where and how their research has been made publicly available. Central to these benefits is the “persistence” of a PID, which ensures that the digital objects they identify can be found in the long term, even if the location of the object has changed. Parts of the federal government already use PIDs<sup>2</sup> to connect researchers, institutions, and outputs such as scholarly publications and datasets with one another. However, the use of PIDs is not consistent across the federal government and it is unclear if existing government systems and identifiers are interoperable with global PID registries. A national strategy that is coordinated with the international research ecosystem is needed.

[25.215] OMB and other federal agencies should ensure that the UEI required for federal financial assistance applicants and recipients can be linked with global registries for persistent identifiers for people (e.g., ORCID), organizations (e.g., ROR), and research outputs (e.g., DOI). This may mean aligning metadata standards for UEIs in SAM with those used by other PIDs and sharing UEI information with global registries.

[25.215] OMB and other federal agencies should ensure that applicants or recipients of federal financial assistance are able to connect (via subfields or another mechanism) any associated PIDs to the UEI in SAM. This would ease researcher, institutional, and agency burden by connecting federal award recipients with other important information such as scholarly publications and datasets which will be useful to ensure compliance and may also support the generation of biosketches for future award applications.

### **Subpart D—Post Federal Award Requirements**

[200.315 Intangible Property] We strongly support OMB’s update to this section that reinforces an agency’s existing right to reuse work resulting from an award, including requiring the work to be made available in a public access repository. We recommend additional language to further clarify and strengthen this section. Specifically, OMB should insert “under terms that provide the public with broad reuse rights” after “This includes the right to require recipients and

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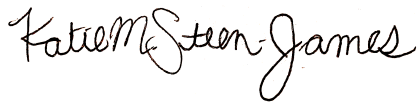
<sup>1</sup> <https://www.osti.gov/pids/>

<sup>2</sup> <https://www.osti.gov/pids/using-pids/impact>

subrecipients to make such works available through agency-designated public access repositories.” This would clarify that the license’s scope includes the ability to require deposit in an agency-designated repository by recipients and subrecipients, and also that the agency retains and exercises its license to authorize others to reproduce, publish, or otherwise use the work.

SPARC appreciates the opportunity to provide comments on the proposed revisions to OMB’s Guidance for Grants and Agreements. Please contact Katie Steen-James ([katie@sparcopen.org](mailto:katie@sparcopen.org)) with any questions.

Sincerely,



Katie Steen-James  
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Heather Joseph  
Executive Director