



February 23, 2021

**Comments on the National Strategy for Expanding American Innovation  
(Docket #PTO-P-2020-0057)**

Submitted here, please find joint comments from the Association of American Medical Colleges, Association of American Universities, Association of Public and Land-grant Universities, and the Council on Governmental Relations on the USPTO's National Strategy for Expanding American Innovation. We also broadly support the principles articulated in the comments submitted by our colleagues at AUTM.

Our organizations are dedicated to achieving rigor and excellence in all federally sponsored research; to increasing equity and inclusivity within our member institutions for inventors of all sexes, genders, ethnic and racial backgrounds, those with disabilities, and veterans; and to securing the most assured and direct means for transferring academic research into usable knowledge and products which result in economic growth, commercial development, and societal impact.

Several of our member institutions have already initiated programs to promote and track invention disclosures and other entrepreneurial activities by diverse groups of students, post-doctoral scientists, staff, and faculty. Sound and systematized national data and metrics to help us better support, monitor, and evaluate these programs would be invaluable. We further observe that the technology transfer and licensing operations of academic institutions, and most faculty development activities, represent investments made by the institutions themselves with their own internal resources. A positive action, like tracking the gender of invention disclosers, is an example of something that could be implemented by most technology transfer offices without necessitating many additional resources.

Federal agencies could also help through collecting and sharing consistent data on participation and success in commercialization activities (such as tracking inventors' self-reported data on ethnicity, race, and gender on patent applications). This would help universities to benchmark institutional performance. The federal government has multiple entities with specialty expertise that could help in these efforts. For instance, USPTO and federal research agencies could partner with universities to engage with underrepresented researchers to help them become familiar with key concepts central to patenting and commercializing technology. Moreover, USPTO could build upon its current K-12 educational programming to expand offerings to graduate students, post-doctoral scientists, junior faculty members, and other university research scientists.

We underscore the importance of taking a holistic approach to improving diversity, equity, and inclusion in the innovation ecosystem. The federal government can and should play a central role in creating more robust pathways to invention and patenting, as well as in supporting the efforts of institutions to create and improve upon such pathways themselves. For example, federal programs providing dedicated STEM grant funding to minority-serving institutions and tribal colleges – building upon exemplary federal programs at NIH, NSF, and other federal agencies – would broaden participation in the scientific enterprise for the nation, increase the diversity of faculty pool in STEM disciplines, encourage more minority scholars and entrepreneurs to advance innovation and economic growth, and assist in the recruitment, retention, degree attainment, and ultimate success of historically marginalized groups in STEM fields. In addition, the federal government could develop and fund a new regional technology transfer consortium program to encourage collaborations between research universities and minority-serving institutions and tribal colleges to expand technology commercialization capacity across the U.S. higher education system. Such collaborations could be bolstered by the provision of capacity-building assistance to individual inventors from underrepresented groups such as through the creation of new mentorship programs and through an expansion of USPTO’s Patent Pro Bono Program and Law School Clinic Certification Program. Although we recognize that some of the aforementioned initiatives may be beyond USPTO’s immediate purview, we believe USPTO’s imprimatur, expertise, and partnership in these areas will prove essential.

In closing, we wish to reaffirm that our organizations jointly endorse USPTO’s development of a national strategy to encourage greater participation in the innovation ecosystem. We fully support this effort and are grateful for USPTO’s vision and forward momentum to advancing these critically important issues.

About Us:

**The Association of American Medical Colleges (AAMC)** is dedicated to transforming health care through innovative medical education, cutting-edge patient care, and groundbreaking medical research. Its members comprise all 155 accredited U.S. and 17 accredited Canadian medical schools; nearly 400 major teaching hospitals and health systems; and more than 80 academic societies.

**The Association of American Universities (AAU)** is an association of 63 U.S. and two Canadian preeminent research universities organized to develop and implement effective national and institutional policies supporting research and scholarship, graduate and undergraduate education, and public service in research universities.

**The Association of Public and Land-grant Universities (APLU)** is a research, policy, and advocacy organization with a membership of 244 public research universities, land-grant institutions, state university systems, and affiliated organizations in the U.S., Canada, and Mexico, that is dedicated to strengthening and advancing the work of public universities.

**The Council on Governmental Relations (COGR)** is an association of over 190 research universities and affiliated academic medical centers and research institutes. COGR concerns itself with the impact of federal regulations, policies, and practices on the performance of research conducted at its member institutions.