



Global Emergency Medicine Academy
Society of Academic Emergency Medicine Comment to NIH
June 26, 2023

We, the Society of Academic Emergency Medicine Global Emergency Medicine Academy, are writing to express our deep concern regarding the new policy change NOT-OD-23-133. While we understand the need for transparency and accountability in data sharing, these requirements raise serious questions about fairness in scientific research. The Global Emergency Medicine Academy stands against the new policy which creates further inequity in global health research and places an undue burden on our global research collaborators.

More specifically, the policy states “For foreign subrecipients, a provision requiring the foreign subrecipient to provide copies of all lab notebooks, all data, and all documentation that supports the research outcomes as described in the progress report. These supporting materials must be provided to prime recipient with each scientific update (no less than once every six months, or more frequently based on risks) in line with the timelines outlined in the agreement.” The Global Emergency Medicine Academy is deeply concerned that the new policy targets international researchers who receive subaward funding. Specifically, the increase in reporting requirements are not accompanied by an appropriate increase in compensation to foreign subawardees, due to the limitations in indirect costs allowed for foreign institutions. By requiring total control of data collected at foreign institutions, this policy change undermines the many recent advances towards equitable collaboration, knowledge-sharing, and decolonization of the global health field.

These reporting requirements place an unfair administrative burden on collaborators, especially junior researchers, and would divert focus from actual research activities towards these administrative tasks. This burden is further compounded in low and middle-income countries where research infrastructure and administrative support for researchers is less developed. We believe that research collaborations should prioritize the advancement of researchers from all regions, ensuring that their expertise is trusted and local knowledge is integrated into research findings.

The Global Emergency Medicine Academy consists of academics and researchers that focus on collaborative and equitable exchange of knowledge. Increasing reporting requirements solely for those of foreign subawardees undermines the spirit of inclusivity and fosters an even greater sense of exclusion that already exists amongst foreign researchers. The policy clearly reinforces existing power imbalances that currently exists in global scientific endeavors.

We truly believe that embracing a more inclusive approach, the NIH can be the impetus for change in such inequities. We hope that the NIH will foster an environment that values inclusivity, diversity and equitable opportunities for all researchers, regardless of their origin.