



January 27, 2020

Dr. Courtney Silverthorn,
Deputy Director, Technology Partnerships Office
National Institute of Standards and Technology
courtney.silverthorn@nist.gov

iEdison Request for Information Regarding the Interagency Edison System for Reporting Federally Funded Inventions; Docket No. 191126-0092

Dear Dr. Silverthorn:

AUTM is a nonprofit organization dedicated to bring research to life by supporting and enhancing global technology transfer, representing more than 3,000 technology transfer professionals, mainly in the United States and in 50+ countries worldwide. Thank you for inviting comments on the Interagency Edison System for reporting federally funded inventions (“iEdison”). Our U.S. members’ institutions reported administering nearly \$40B in federal research funds in fiscal year 2017, and are heavy users of iEdison. Since AUTM itself does not use iEdison, we have reached out to our members’ institutions and encouraged them to respond directly, with specific issues as requested. We support the comments submitted by our sister organization, the Council on Governmental Relations, on January 24, 2020 and take this opportunity to highlight certain recurring themes in our discussions with members now and over the years.

As noted in AUTM’s response to NIST’s green paper, we welcome NIST’s involvement in managing and updating iEdison for reporting federally funded extramural inventions and modernizing and rebuilding it. An updated system could provide a smooth and efficient interface between the iEdison users and the federal agencies, while ensuring appropriate reporting on federally-funded inventions, but it’s critical that the system be helpful and friendly to the user. Because of the nuances and challenges of the existing system, we strongly encourage NIST to engage with a group of stakeholder users throughout the re-building process. Most helpful would be for NIST to form a standing working group of users who can provide ongoing feedback and test updates as they become available.

iEdison provides a constant mechanism for users to report federally-funded inventions, but not all federal agencies use iEdison and even within an agency, inconsistent handling by reviewers leads to frustration and time-consuming changes. Under the current process, universities must remember myriad reporting requirements depending on the agency. It would be enormously helpful if all federal agencies were required to use iEdison to decrease confusion and inconsistent reporting requirements. This would also harmonize the data uploading processes and as many field names as possible across agencies. Rebuilding the



system would afford an opportunity for NIST to re-think the structure of the system and develop internal guidelines and parameters for both users and the agencies to ensure consistent information across all cases. Even better, adding descriptors near the individual fields would provide clarity to both users and reviewers on what exactly that data field represents and would bridge the gap on individual disparate interpretations.

NIST should ensure that responsive contacts at the federal agencies are available when questions or issues with the system arise. Users want to report properly, but it's very difficult and frustrating when the system doesn't allow us to do so. As you'll see in the detailed comments, common concerns surround the government support clause, the grant award number designation and website navigation issues.

The new system should provide more documentation about field names and the electronic relational diagram "ERD". This alone may identify sources of frustration, such as fields with confusing names or definitions, or places calling for entry of redundant information which could have otherwise been auto-populated from data already entered into iEdison. NIST also could consider working with technology transfer database service providers to i) allow iEdison to accept data directly from their databases or ii) enable users of their software to download a report which can then be uploaded directly into iEdison. A recurring frustration among our members is being required to enter the same information in several places which increases the chances of inaccuracies which leads to administrative burden or unnecessary costs to correct such errors.

Finally, iEdison could be used to generate reports about individual cases, patent families, or aggregated metrics of performance that the various users of iEdison would find helpful. A database such as iEdison which links research grants to practical outcomes, such as patents, licenses, and products, and follows the translational process over time has great potential to add to our understanding and management of our innovation ecosystem.

Thank you for the opportunity to provide input. Attached are more detailed, technical comments that NIST may find useful. If NIST seeks additional input as it rebuilds the iEdison system, AUTM would be glad to connect NIST with its members.

Sincerely,

A handwritten signature in black ink that reads "Stephen J. Susalka". The signature is written in a cursive, flowing style.

Stephen J. Susalka, PhD, CLP, RTTP

AUTM CEO

AUTM Technical Comments on iEdison (January 2020)

1. What, if any, current features of iEdison does your organization believe should be retained in any updated version?

- All historical data that is presently in iEdison should remain.
- Family tree views of the technology records and the subsequent patent records.
- Self-reporting. It's important that we continue being able to handle our own reporting and record updating.
- Auto population of the patent data to the confirmatory licenses.
- Bulk upload of data pertaining to utilization reporting using a .csv file.
- Links to funding agreement formats should also be preserved. iEdison only accepts correctly formatted grant numbers during invention reporting and we find that useful for making sure we know how the grant needs to be listed in the Government Support Clause (GSC).
- Ability to search by grant/contract number, invention docket number, invention report number.
- The ability to add other organization codes for viewing rights of records. (See below for improvement suggestion related to this feature.)
- The ability to include our own docket numbers instead of a record number being assigned by iEdison.
- The current visual tree and continuity of relationships in patent family is important to see how each filing relates. Both the vertical and horizontal views are helpful.
- Ability to link inventions (two separate disclosures result in one patent application).
- The ability to efficiently communicate invention reports through invention report forms, title election (or waiver of rights), patent information through patent records, and annual utilization reports through the iEdison user interface rather than through email or traditional mail correspondence
- Flexibility to navigate the website and edit different cases and uploads as necessary.
- The FAQ section is helpful for both new and experienced users alike. However, the way the information is organized is quite convoluted and difficult to easily navigate.
- Retain formatting description page.
- Retain links to current federal agency contacts.
- Retain timeline pages.
- Retain all searches, including the search for utilization reports by year.
- Retain notification message download.
- Retain 'Upload iEdison invention Report Datastream'.

2. What challenges, if any, is your organization experiencing in reporting inventions in the iEdison system? Where practicable, please provide specific descriptions and/or screenshots of user interface screens or error messages.

- Common prosecution strategy of filing multiple provisional applications within a technology family. For example: If there are multiple Provisionals within the family, you cannot get the other #260 notification message (the provisional filing is due to expire. Either a non-provisional or a PCT patent application must be uploaded) to clear.

- Several federal agencies do not use iEdison. i.e. Airforce is listed as a user, however there is a gap here as they are only accepting D882 forms.
- Consistent point of contact. Some agencies do not have consistent point of contacts and it is difficult to find answers when reaching out to agencies on the iEdison website. Contact information is either incorrect, not updated or missing for agencies.
- Lack of consistency with regards to how data should be entered into iEdison for each agency. An invention status “unpatented biological material or research tool” – this status is not used by all agencies, thus requiring the institution to develop distinct operating procedures for each separate funding agency.
- Patent family data structure does not accommodate the complexity of patent prosecution. In many cases patent prosecution can be complicated resulting in multiple parent patents yielding multiple children. Thus, limiting the institution in how to best depict complicated patent relationships in the system within the systems limitations.
- No Notification of opening records that need to be updated. For example, when you request a record to be opened to input missing information for such notifications as #160 (barred status), you will receive no notification that it was opened and then the record will return to locked status at midnight therefore causing you to request the same record to be unlocked again.
- Institution’s responsibility to correct GSCs or Confirmatory Licenses (CL) on patents that have already been abandoned or expired. Thus, having to use the Executive Order 9424 through EPAS on the USPTO site.
- Unable to accommodate the 2018 updates to the Bayh-Dole act which has led to NIH to employ workarounds. For example, requesting title and patent extensions.
- Manually duplicating data maintained internally into iEdison. When it seems like there should be integration with current Tech Transfer software (Inteum, Innovate IP, TechTracS, Sophia, etc.)
- Inability to look at data from other government agencies such as USPTO PAIR, NIH REPORTER, NASA, etc.
- Frequently having to log out of iEdison to clear cache to be able to view documents pertaining to technology records.
- Old Bayh-Dole 1980 versus the new Bayh-Dole 2018 fields and indication of each one.
- Invention Disclosure rejections for more detailed description required should include more specifics so we can go back to our inventors with specifics. Often these seem to be subjective rejections.
- Inability to run reports in iEdison, must export to excel and then figure a way to get information you need/want.
- Current system does not maintain a record of email exchanges.
- Unstructured notes in the old system will not translate to new field requirements.
- Inconsistencies between iEdison/NIH reviewers’ procedures. In the past, some entries were accepted by one reviewer but the same entry in another record is rejected by a different reviewer. An example is the grant number: a leading 0 could be missing from the grant number on the disclosure but written correctly in the iEdison record. Some reviewers accept the missing 0 on the document; some reviewers reject it.
- Certain fields have a character limit that is too short, such as the “Type of document” field.
- We have been told that the only way to trigger a review of an invention record is to re-upload a disclosure. Reviews should be triggered by more than just uploading a document – any time an explanatory note is typed into the record, a review should be triggered.
- In order to request an extension to elect title or file a patent, iEdison requires that a supporting document have a specific file name in order to trigger review. Occasionally the same document

has to be uploaded a second time, such as when a 1 year extension was made and then a 2nd year is being requested down the line. We are unable to upload a second document with the same name receiving an error message, but the exact wording needs to be used to trigger review (extension requests). We found a potential workaround: add (Y2) but that sometimes doesn't trigger review since the file is named differently.

Error Message

Please rename the document name so it is unique to the invention or patent. (ID: 201668)

- Inconsistencies between agencies with regard to regular response to document uploads which should trigger review. For example, when uploading the correctly named supporting document for an extension of time to elect title, several federal agencies don't actually review or approve it (examples have been FDA, DOD) automatically. We have to send a follow-up e-mail asking they do so. There are also some uploaded GSC documents that have been sitting in patent records without having been approved or rejected for months.
- There is a habit of inconsistent and delayed response times in reviewing records (accepting/rejecting disclosures) and answering emails. It seems that new disclosures are addressed in a fairly timely manner, but in attempting to clear out the backlog of rejection notifications, some requests sit for months without being addressed. A main challenge is knowing when it's appropriate to follow up on a request that hasn't been addressed. What happens to requests once they go in the queue (via iEdison portal or email)? Is there an SOP of standard response rate? E.G., is there a goal of sending a response within 5 business days? If we know what the goal is, we would wait to follow up until that timeline has passed. Otherwise, without a response in a timely fashion, it's hard to know whether the request has been received or is lost in the ether. This is especially a problem with agencies not under NIH's control. Transparency of and clarity on the process on the federal agency end would be helpful.
- iEdison support response time has been hit-or-miss. Initially, sending requests regarding error messages or other questions related to iEdison compliance would elicit a response time anywhere from one or two weeks to a month. However, recently the response time has been vastly improved as issues are commonly addressed within several days at the latest.
- Rejections are sometimes not specific enough and require further follow-up to understand what needs to be fixed for an invention record to be accepted. A clear reason for rejection would be inform us on how to correct the issue.
- Sometimes an author list can differ from inventor list and the inventors listed on disclosure may not include all authors on a manuscript. We should be trusted that the inventor listing we submit is correct and shouldn't have to take additional steps to confirm when the manuscript has additional author names who are not actually inventors.
- Similar to the above, we should be trusted that the publication date listed on article is correct and we shouldn't have to rewrite it at the top of the document. It creates unnecessary work.
- Similarly, certain agencies issue 130 type notification messages when the invention disclosure lists a manuscript but the publication date field in the iEdison invention report screen is left blank. This has to then be corrected by adding the text "not yet published" next to the manuscript listing in the invention disclosure. To reduce the amount of work placed on the user, consider adding a field with a check box to the iEdison invention report screen that reads "manuscript – not yet published".

- There are limited ways to communicate to an agency with specificity when a case (invention disclosed to our office) is no longer viable. For instance, when an inventor reports that the intended invention has been published by another inventor. As such, a method to close or archive a disclosure/case number with an explanation text box to provide details if appropriate would be very helpful.
- It seems that certain agencies require the invention disclosure to be fully enabled which goes beyond the 401.14(c)(1) requirement (e.g., [the disclosure] shall be sufficiently complete in technical detail to convey a clear understanding to the extent known at the time of the disclosure, of the nature, purpose, operation, and the physical, chemical, biological or electrical characteristics of the invention). The level of detail required in a fully enabled invention disclosure is not always provided by the inventors at this stage resulting in 130 type notification messages which cannot be remedied right away. This requirement seems to be subjective based on the reviewer at the agency and we have had several overturned by emailing and arguing that the disclosure met the requirements under 401.14 (c)(1). In addition, there is no way to communicate case developments when a former notification error has essentially frozen the case in iEdison. For example, when the "The Invention Disclosure submitted is not accepted." because it is not detailed enough, and we have no additional invention information to provide. Many university inventions are early stage, but inventors are encouraged to disclose promptly when there may be limited information. At this point, we can not enter any updated information on the case because we are unable to "clear" this error.
- No way generally to close an old case with an outstanding notification message pertaining to some insufficiency many years old. It would be helpful to have the ability to explain on a case-by-case basis the futility in correcting a matter since the case has been long abandoned (particularly for situations where high costs would need to be incurred to revive an old patent application of no commercial value or patentability potential just to correct a long ago error).
- Particularly, the inconsistency and large volume of error messages is an extreme administrative burden. When one error message is addressed, several more appear in its place, which makes it difficult to address the issues at a reasonable pace, creating backlog and other hindrances to reporting and compliance. At other times, an error message appears for an issue that did not generate an error message under the same conditions. New Bayh-Dole regulations causes additional barriers and extraneous effort on all parties due to increasingly stringent regulations.
- The iEdison user manual suggests we strike personal information (e.g., phone number, home address, country of citizenship) from the invention disclosure forms – a step that can be quite time consuming. Considering the only release of this information into the public sphere might be with a FOIA request, it would be helpful if the agencies took charge of this step by confirming that they strike personal information prior to release.
- Abandoned cases. It is nonsensical to upload missing or further correct GSCs and confirmatory licenses for abandoned cases that are in some cases several decades old. A five to ten year cap from the date a case is abandoned is suggested, or at least some process to clear up flawed GSCs. Even so, should this continue to be a necessity, the process for uploading and acceptance of corrected GSC and confirmatory licenses needs improvement. Batch uploading would reduce the time taken to search for and upload to each individual case. GSC rejections have been particularly burdensome.

- Research funding from different sources which do not have the same reporting requirements. When a researcher received multiple sources of federal funding, but those sources all have differing reporting requirements, this creates an administrative burden to research the sponsor guidelines of each federal funding agency. I.e. NASA is a federal agency that does not receive invention reporting through iEdison. Investigators and administrative staff spend time, energy, and resources tracking and complying with different sets of rules, regulations, and policies that address common core issues and concerns.
- Update the grant number format as it's outdated. When the grant numbers aren't accepted by iEdison, then we have to flag: Other as the secondary agency and list grant numbers in the proper format. Many inventions have multiple agencies. Identify NIH as the Primary agency as DOD, Army and Air Force are the agencies whose format is not accepted.
- Website navigation issues. This requires a lot of back and forth between invention reports, patent reports, as well as additional pages. The current invention/patent vertical or horizontal family tree structure requires constant cross-referencing. One suggestion for improved navigation is to have all the family tree information included on a single page.
- Guidance or better explanation of needed dates along the process. Should the date requested be 1) today's date, 2) the date something happened, or 3) some other date. After using this system for years, sometimes one still doesn't know what date to use. An example might be "Invention Report Date" in the invention record. Is this the date the invention was disclosed to the university or the date the university is reporting it to iEdison? This might be explained somewhere buried in the site but it don't seem to be explained in the invention report form itself.
- Insufficient or missing confirmatory license: One thing that would make reporting easier is if we didn't have to upload a confirmatory license for each invention since it is understood that the funding agency has a license to the invention. Please note that issues with confirmatory licenses are much fewer now that iEdison has cleaned up their system. One license uploaded for the first filing and all connected filings will fulfill their requirements. The formality of us assigning a license to each funder for each funded invention seems excessive.
- Rejected GSC. The wording of the clause will also be rejected if it does not exactly match the NIH language: "This invention was made with Government support under (identify support) awarded by the PHS. The Government has certain rights in the invention."
 - If the clause differs or says "may have", it is rejected. We use the exact language but some older support clauses did not. In those cases we have to have patents corrected at our own expense.
 - GSCs are rejected because the numbers in the patent application do not exactly match the numbers reported to iEdison. Example: a number may be reported to iEdison as GM123456 but it might be entered in the patent application as R01-GM123456-01. This used to be acceptable to iEdison because the core number, GM123456-01, was present. The other numbers have to do with the iteration of the award. These numbers sometimes inadvertently get added to the patent application by the attorneys. When the number is rejected, we have to have the patent application amended at our expense.
 - GSCs may also be rejected because there is a hyphen between the letters and numbers or if a leading zero is missing.

- In short, the agencies have become extremely picky about the GSC in recent years. It would be helpful if they accepted the number if the core number was present (as they used to) or if there was a hyphen present. We try to direct our attorneys to put the exact language and award information in the patent application but they are not in house attorneys (so sometimes things slip by so a bit of leniency would be appreciated if the main information is submitted).
- Sometimes we have verified award numbers (i.e. award numbers that are used in the award documents) that iEdison will not take. The formatting for each agency is listed in a document in iEdison. Sometimes the number we have does not match the formatting. In those cases, we can't enter that number into iEdison even though the number is what is in the award document. This makes it hard to report. Sometimes there's a work around, sometimes there isn't (example- I believe DOD lets you write in "DOD Award" in the award # field and then enter the number you have in the comments field. I don't think this works with any other agency. Other workarounds are adding dashes or zeros to the existing number to make it conform to the formatting. This is dangerous, though, since it alters the number that is in the award document.
- It is frustrating that inventions for all agencies are not reportable through iEdison. It is very difficult to try to determine how to report to an agency that is not in iEdison. It is extremely frustrating that NASA is not reportable through iEdison as reporting to NASA is not easy and must be done separate to all other reporting. Another agency that are not reportable through iEdison are SPAWAR (SPAWAR is now another agency altogether). There are other sub-agencies that are not reportable through iEdison.
- EPAS- unless a patent or applications has NIH funding, there is no way to clear an iEdison notification about a missing or incorrect GSC if a patent or application has expired. NIH patents or applications can be amended with the USPTO to add the GSC after they have expired through the EPAS system. This will clear the notification message. This only works with NIH funded invention. There is no way to clear these notification messages for inventions that have funding from other agencies. The notification as impossible to clean. We would like to be able to clear the notification message when there is no further action we can take. Please note that these message can be suppressed, but they are not resolved.
- When a GSC is rejected, iEdison adds a rejection language to the record. Often the language is cryptic and unclear. It would be better if the explanation was more clear.
- The reporting timeline doesn't match the real-world timeline of filing a provisional, then a PCT, then going national. This is a 30 month process. IEdison wants us to file a non- provisional application 12 mnths after electing title. We now elect title when we file the provisional. If we file a PCT after the provisional, the PCT claiming priority to the provisional will not go national for another 18 months. We will receive a notification message from iEdison for that period that we are out of compliance because we didn't file the non-provisional. They do have a workaround. By reporting the provisional and PCT, that should stall the notification message, but it's frustrating trying to navigate the system.
- It would be useful if iEdison provided us with at least one field for our internal use, such as to id the case manager.
- Paper reporting and closing old cases: for years we reported via paper. We mailed in documents to the agencies. The agencies were supposed to unload those docs into iEdison. Sometimes they did not. When we started using iEdison we found that some of our inventions were not in

iEdison. When we tried to continue reporting or close the records, we have to upload the many old case ourselves as the federal agency never uploaded them. Old cases often have multiple prosecutions, and years of utilization reporting to do. This sometimes is still a problem when we have an old case that we are trying to close out in iEdison and we find it was never uploaded by the federal agency. If the record is not there, we need to upload all the documents. If we find an insufficiency in a GSC from years ago, the newly uploaded document for an old case will trigger a notification message of insufficient GSC, thus blocking the record from being closed. We often cannot resolve such insufficiencies and are therefore stuck with notification messages that cannot be resolved. This also means we cannot close the record in iEdison.

- One major problem is that messages/errors have to be cleared before a case can be closed. When one looks in the messages, there is nothing there which is a mystery.
- When a disclosure references a publication but no publication date is added to the invention record, we get a notification message. Then we have to search for a publication for the invention. This is difficult.
- When reported inventions are rolled into other reported inventions it is difficult to connect the records in iEdison and not continue to get notification messages for the case that was rolled into the remaining invention.
- There should be a way to enter the same application number multiple times for jointly held cases, as it creates extra work to work with the other institution to sort the matter out as only one organization can report on an invention. More than one invention record can be created when a joint invention is accidentally reported by both institution, but only one organization can report patent information. Then the other organization has to have their invention record deleted or they will keep getting notification messages to continue to report (but they can't).
- It should be easier to change election title back and forth in order to be able to make corrections. As it is now, opening a closed case requires contacting iEdison via phone call, as the notes section does not ever seem to be read. Calling iEdison to open a case requires hours of phone calls and follow up, as it takes multiple attempts to get through and phone messages are never returned.
- Agencies have been asking Principal Investigators to submit invention disclosures even though it is not really an invention and hasn't been disclosed to the employing institution yet.

3. What improvement could be made to the iEdison system that would reduce your organization's reporting burdens, improve its experience, and facilitate your organization's ability to comply with reporting requirements?

- User manual for new system to include why and how to fix issues with reporting in iEdison (example: sometimes the system won't allow us to add a Non-Provisional even though it's required)
- More specifics for Invention disclosure rejections
- Only require reporting on commercialized technologies
- Require all federal agencies to use iEdison and standardize the reporting requirements on utilization, use of research tool, and better manuals to provide guidance for resolving notifications and rejections.
- If no action is required (barred technologies) agencies should deactivate the message.

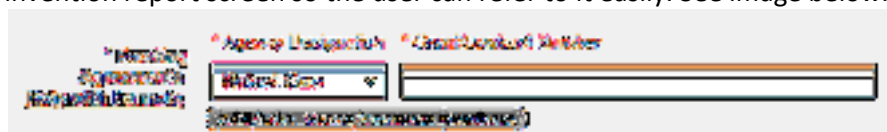
- Adding new fields to the new iEdison based on the 2018 Bayh-Dole changes for expanded data requirements.
- A field for a request for extension of time to file beyond the ten months allotted to file a non-provisional application.
- Ability to remove an invention report or patent report if reported in error.
- Ability to update the publication dates without having to email a request to an agency.
- Ability to move patent records between technology records without agency assistance.
- Expanded application status options to include “expired” and “abandoned in favor of continuation”
- Having to leave a technology record to search for it again to be able to upload patent record or utilization report.
- Drag and drop ability to align patents family relationships.
- Ability to “waive” all patents within a technology at the same time without having to go into each individual patent record.
- Links within iEdison to agency personnel for questions.
- Drag and drop attachments from desktop/folders to the record in iEdison
- Unlimited number of inventor list entry
- Unlimited number of country list entry for foreign filings
- Dashboard displays of outstanding notifications messages grouped by category.
- Standard reports that you can easily pull from iEdison.
- Currently no official training or certifications for competencies in Federal compliance reporting.
- Integration with USPTO
- Bi-Directional data flow between IP databases and new iEdison. For example, if you elect title in one system, it can be updated in both systems.
- Mouse over preview pane of uploaded documents to verify that the document uploaded is the correct intended document.
- The entire iEdison system could be modernized such that it requires fewer entries and clicks, e.g., accessing specific notification messages.
- It would be helpful if the notification messages awaiting action were reorganized by importance so the user does not have to sort through all of them to get to particular results. As an example, the 60 day expiration of a statutory deadline is a time-sensitive notification, so perhaps it can be color-coded and organized so it appears at the top of the list.
- There needs to be a better system for noting which inventions fall under the New Bayh Dole Rules – those that include a grant with a budget start date of 10/1/2018 or later
 - Next to the funding agreement, there could be check boxes to indicate whether the award qualifies as Old Bayh Dole or 2018 Bayh Dole. Depending on which box is checked, this can trigger additional requirements. Currently the instruction from NIH has been to include in the explanatory notes whether an award is Old Bayh Dole or 2018 Bayh Dole. Ideally, iEdison would be linked to the Reporter system so that iEdison knows the dates of the federal awards listed. If that’s not possible, there should at least be a better system for noting that an award falls under the New Bayh-Dole rules.
 - Institutions sometimes file a second provisional application once the first expires. Under 2018 Bayh Dole, NIH has advised that users cannot link these two provisional

applications to the same invention record. Instead, they have to create a new invention record for the second provisional and email NIH to void the first record (although both are for identical inventions). This area should be addressed.

- We are currently required to add an asterisk after the name of any inventor who is a federal employee on an invention supported by a grant with a budget start date of 10/1/2018 or later. There should be a better system for this.
- Under 2018 Bayh Dole, a confirmatory license (CL) is required for provisional applications but the step to trigger that notification is not in place. This trigger should be added so the user receives a notification to upload a CL
- We are currently able to add organization codes so that additional institutions can view the records. It would be nice to add the organization code once (on the invention record) and have the option to automatically extend the viewing rights to any future patent records. This shouldn't be automatic (in case a certain filing does not include the inventor from the other institution), but should be an option instead of needing to add the code separately to each new patent record.
- The "Invention Report Date" should be relabeled as "Date reported to institution" to eliminate confusion of accidentally listing the date when it's being reported to iEdison.
- Invention record should have three to five blank inventor name fields on the first page to allow for easier invention record set up.
- Invention record should have three to five blank grant number fields on the first page.
- Patent record should have three to five blank foreign filing fields on the first page.
- During the process of saving a new record, a user should be able to review a record, click "go back" to make changes and then be able to save the record – currently, you cannot save the record after clicking "go back".
- Once a user closes a record, it should be able to be opened by another user instead of the first user needing to log out of iEdison entirely.
- On the invention record, the extension requests are currently done by uploading a PDF or TIFF file. Instead, the extension justifications should be listed in a pre-populated pull down menu like the pull-down menu included for "Not Elect Title Reason".
- Patent record status should include a "Patent Expired" option in addition to "Institution retains rights" and "Waive to Government". Currently, we are using the "waive" option to cover expired patents which isn't accurate – there is no patent to waive in these instances
- Add a feature where a user could run a report of their user activity for the day – a dashboard of what they modified (record changes, etc.)
- Add a feature where we have the option to undo record changes (e.g., accidentally waiving a record) within short (24 hour) period so that the user can catch mistakes and be able to fix them before the record is added to the reviewer queue.
- Add a feature where you could send an email to the iEdison help desk directly from the record. Currently, some users are using the "Explanatory Notes" field to write a note indicating when an e-mail was sent. By having an e-mailing option from the record, the trail of correspondence would be logged in the record.
- Add a feature of batch uploading for Utilization reports by uploading an Excel report exported from our database's annual utilization reporting screen rather than having to go into each individual case. We are aware that some other universities do have this feature, but it would be

nice if the options on the iEdison side weren't as limited. It would be helpful to upload information annually, biannually or quarterly.

- Add a feature of seeing if the invention has been included on any federal grant reports. If a grant was reported in error, we need to check to see if the invention was reported on a final report or RPPR before waiving the record. It's a cumbersome process since there is not an easy repository of this knowledge to which we have access.
- Provide a method for indicating when a case is no longer relevant which should not continue to be subject to futile notification messages.
- Minimize or eliminate duplicate notifications for older entries based solely on formerly reported information. It lessens the relevancy of the notification system.
- Provide an ability through iEdison to communicate with an actual individual at an agency about non-routine matters that cannot possibly be resolved through the limitations of the iEdison user interface functions.
- The user interface and user experience feels greatly outdated, and the functions generally feel clunky.
- On inconsistency, it is preferable to have a system of error messages that is easily tracked for convenience. A system of logging error messages, and uploading any required documents directly into that portal, would greatly reduce administrative burden and increase regulatory compliance.
- On website navigation, improved integration of invention, patent, and utilization report searches instead of on several different screens.
- Further website navigation improvement would be to have all the family tree information included on a single page.
- On improving response time, adding additional staff to assist with issues, or improving training on frequently occurring issues or questions could drastically improve the iEdison response time. Adding a user-driven open community forum which allows users to post and comment regarding frequent issues, without disclosure of confidential information or other protected information associated with the organization can reduce the burden on iEdison staff. Greater training resources, webinars, and other opportunities to interact directly with iEdison staff on a regular basis would be welcomed as well.
- Add a feature so the user could add a patent and/or utilization report when they are in the iEdison invention report screen.
- Add a feature so the user could create a child patent record from the parent patent record.
- Allow the user the ability to upload multiple years/records for the annual utilization reports.
- A good way to improve user experience and speed up reporting might be to add live tips next to important fields.
 - For instance, NIH does not require the reporting of awards “primarily for educational purposes such as fellowships, scholarships, and most training awards.” It would be helpful to have this exception listed as a tip near the funding agreements section in the iEdison invention report screen so the user can refer to it easily. See image below.



- Are there plans to add the Veterans Administration (VA), National Aeronautics and Space Administration (NASA) or Naval Information Warfare Systems Command (NAVWAR, previously SPAWAR) as agencies that manages reporting through iEdison?
- Is it possible to create a link between iEdison and the necessary records in the USPTO Electronic Patent Assignment System? This would speed up the process of clearing out 233 type notification messages for abandoned applications that cannot be closed out due to a non-compliant GSC. Currently, users must upload the notice of recordation received from the USPTO for filing in EPAS, the GSC fillable form that was provided by the agency, and a notice of abandonment for which the application abandoned.
- Can there be an override for non-matching funding agreement number formats? Currently there is no way to get past the following error message and users have to email the funding agency to find a solution. Some agencies have trickier grant numbers than others.
 - The Grant/Contract Number ABC123 is improperly formatted. Please check the number format, realizing that not all types of agency funding agreements are valid for iEdison reporting. Check with the agency contact for further assistance. (ID: 201712)
- Allow auto-upload of data from local databases to iEdison. Perhaps work with some of the main database providers to effect such a system.
- Accept minor wording changes in the GSC as long as the meaning is exactly the same.
- Provide a mechanism for corrections or to upload proof of when learning late that an invention is federally funded.
- Accept e-signatures on all documents, e.g. disclosures, government licenses.
- Most of the problems with the provisional application and the GSC not being included is because it's not a full application without specifications. Often, it's just a USPTO cover page and a manuscript which acknowledges federal funding. If the box is checked "Yes" and the grant information is listed on the formal USPTO filing papers, could the federal agencies be lenient and wait until the non-provisional application is filed with the correct GSC? Provisional applications cannot be amended, so one may have to re-file the application in order to effect the correction.