August 16, 2024

Chairwoman Cathy McMorris Rodgers
House Energy and Commerce Committee
2125 Rayburn House Office Building
Washington D.C., 20515

RE: Request for information on NIH framework and reform

The American Society for Biochemistry and Molecular Biology is an international nonprofit scientific and educational organization that represents more than 13,000 students, researchers, educators and industry professionals. The ASBMB strongly advocates for strengthening the science, technology, engineering and mathematics workforce, supporting sustainable funding for the American research enterprise and ensuring diversity, equity and inclusion in STEM. The ASBMB appreciates the chance to provide input on the proposed NIH framework, and we urge policymakers to continue seeking input from the research community and other stakeholders during the NIH reauthorization process.

Recommendation 1: NIH must continue to prioritize investigator-initiated, curiosity-driven basic research

Investigator-initiated, curiosity-driven research fuels innovation, and basic science research is the cornerstone of all medical breakthroughs. Basic science research seeks to understand the principles, mechanisms and processes of all living things including humans. The fundamental knowledge gained through basic science research forms the essential foundation for breakthroughs in how to predict, prevent, diagnose and treat diseases. Life-

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agency addresses research misconduct and actively sought feedback from the scientific community on the proposed changes to ease administrative burden. The NIH has also paved the way in transparency when it comes to research misconduct cases and has provided concrete case studies from which scientists can learn.

Lastly, the NIH has implemented numerous recommendations from the NIH Advisory Committee to the Director Working Group on Changing the Culture to End Sexual Harassment.

NIH has provided significant clarity on how individuals can report harassment; it has made public all cases since 2018; and it is continuously monitoring the impact of policy changes to ensure individuals across the research enterprise are learning and working in safe and inclusive environments.

The ASBMB recommends policymakers closely track and understand the short- and long-term impacts of the policies the NIH has already enacted to address these challenging issues before changing these

opportunities and challenges no single institute or center could tackle on its own. The NIH roadmap launched in 2004 and eventually became the NIH Common Fund following the 2006 NIH Reform Act. It has been two decades since the Common Fund was initiated, and it is an important source of money available to the NIH Director for high-priority initiatives in biomedical and behavioral research.

These initiatives support researchers in removing roadblocks to research discovery, push the boundaries of biomedical science, and help enhance the research workforce to ultimately address and solve key problems through innovation and teamwork across the NIH institutes. These short-term initiatives from the Common Fund aim to achieve a set of high-impact goals within a five-to-ten-year timeframe and evaluate if an IC may become the new source of support (funding) or offer as a resource for use within the scientific community.

The Common Fund is currently supporting 27 programs and archived 32 additional programs from its portfolio. For example, the NIH Medical Research Scholars Program was supported by the Common Fund from FY 2004 to FY 2014 with the aim of providing training for the next generation of clinical scientists to learn about translational research. Since FY 2014, the MRSP program was transferred to the with continued success, with several alumni getting funded by NIH and publishing peer-reviewed articles on research co[illegible]fter program.

The ASBMB recommends maintaining and funding the Common Fund for use by the NIH Director to pilot new programs and determine their sy3 -6(c)4(e)4(ss. S)-5(tar)5(ti)-3(ng these)5(ini)-3(ti)-3(a)4(ti)-3(ve)4(s in

One example is the Next Generation of Researchers Initiative, which provides additional funding opportunities for early career investigators, ensuring that they stay in the STEM pipeline and become established principal investigators (PIs). This program has had significant success ensuring mid-career scientists are receiving an equitable percentage of grant funding and has helped reduce funding inequities across career stage. Thanks to the proactive work, which includes this initiative and others, NIH grant funding is distributed more equally across career stages and demographics. As recent as fiscal year 2022, fewer than 10% of PIs have three or more grants, and that number has been steadily declining since 2017.

In addition to the NIH tackling funding inequity, individual NIH institutes are changing their policies to ensure their awards are not concentrated on a few already-well-funded principal investigators. For example, the National Institute on Mental Health recently implemented a new policy that requires special council review for any grant applications from a PI receiving more than $2 million. NIGMS requires extra evaluation for applications from well-funded labs (which it defines as labs with over $1.5 million in annual total costs for research support) to ensure that the research being proposed is truly innovative. And, lastly, the National Institute of Neurological Disorders and Stroke implemented a stringent payline for all grant applicants requesting $500,000 or more in direct costs. All these efforts illustrate that individual NIH institutes are changing their policies to ensure funding is equitably distributed across the scientific workforce and that their institute budgets are fully utilized.

The ASBMB strongly recommends Congress encourage NIH institutes to explore what policies would benefit their budgets and research priorities instead of implementing a cap on the number of grants one PI can hold