



AMERICAN
PSYCHOLOGICAL
ASSOCIATION

July 15, 2005

The Honorable Joe Barton
Chairman, House Energy and Commerce Committee
2125 Rayburn House Office Building
Washington, DC 20515-6115

The Honorable John Dingell
Ranking Member
House Energy and Commerce Committee
2322 Rayburn House Office Building
Washington, DC 20515-6115

Dear Chairman Barton and Ranking Member Dingell:

On behalf of the American Psychological Association, a scientific and professional society with 150,000 scientists, academics, practitioners and students worldwide, I am writing to submit the following comments regarding the proposed reauthorization of the National Institutes of Health. I appreciate the opportunity to work with you on this important public health issue and commend you on your efforts to improve our nation's scientific enterprise.

As an organization committed to improving the federal research infrastructure and support for biomedical and behavioral research, APA supports your efforts to increase coordination and efficiency within NIH and to eliminate burdensome reporting requirements. NIH is the premier biomedical and behavioral research institution in the world. Its mission is to support science in pursuit of fundamental knowledge about the nature and behavior of living systems and the application of that knowledge to extend healthy life and reduce the burdens of illness and disability. At a time when genetic control over diseases is tantalizingly close but not yet possible, knowledge of the behavioral influences on health is a crucial component in the nation's battles against the leading causes of death and mortality. Six of the ten leading causes of death in the United States are behaviorally based, including HIV/AIDS, smoking, violence, accidents, poor diet and substance abuse.

Given the important contributions of behavioral research to achieving the NIH mission, it is critical that it be reflected in the reauthorization. **Therefore, APA encourages the Committee to use the term of art, "biomedical and behavioral" wherever it refers to the broad research portfolio supported by NIH.** This term was used throughout the 1993 reauthorization and in earlier bills, and is more inclusive than the term "biomedical" alone. (See bill language #1).

There is also a need to recognize the importance of basic research to the NIH mission. Basic biomedical and behavioral research is the foundation for developing new treatments and interventions for all diseases that affect individuals. Understanding how cells operate and how

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normal biological systems function is critical to understanding how diseases alter the appropriate functioning of the body. Likewise, understanding normal cognitive, behavioral and social development is key to understanding abnormal behavioral disorders and emotional disturbances. **APA encourages the Committee to make a specific mention of support for basic research to reinforce its importance.** (See report language #1).

We agree with the Committee that there is a need for increased transparency and improved coordination among the NIH institutes and centers. However, it would appear that this legislation goes farther than necessary to achieve those goals. The unprecedented concentration of management, budget and grant-making authority in the Office of the NIH Director could lead to a number of unintended consequences, including an increased risk of politicizing the position of the NIH Director. As the Institute of Medicine recognized in its 2003 report, *Enhancing the Vitality of the National Institutes of Health*, “the decentralized structure of NIH...has been and should continue to be an integral element in NIH’s success.”

The proposed Division of Program Coordination, Planning and Strategic Initiatives (DPCPSI) could serve as a successful mechanism to achieve the goal of improved coordination for trans-NIH initiatives. Much can be achieved by undertaking strategic analysis of crosscutting research issues or areas of research that may not be addressed by any one institute alone, though it is not clear that additional coordination or efficiencies can be gained by providing for direct grant-making authority within the Office of the Director. The Office of the NIH Director should not be in direct competition with the institutes for investigators or particular areas of research. It would then essentially become the 28th Institute or Center. Ironically, exercise of this authority could divert resources from the very management and coordination activities that the Committee seeks to increase in the OD. (See bill language #2).

In addition, the proposed expansion of the NIH Director’s transfer authority to manage trans-NIH research initiatives could pose challenges to the individual institutes and centers in achieving their own missions, while at the same time supporting trans-NIH initiatives. The draft bill does not indicate what would be a maximum percentage of an institute’s budget that could be transferred by the Director to fund trans-NIH initiatives, other Institutes, or other DPCPSI research programs. The ability of individual institutes and centers to retain program flexibility or to plan in advance for future research projects may be compromised if the transfer authority for any given year is either increased too fast or unpredictably from year to year. **To retain stable sources of funding across the I/C’s APA would recommend that the Director’s transfer authority be increased progressively over the course of this three year authorization, with no more than a one percent increase over the previous year.** To put the numbers in context, even a 5 percent transfer from the institutes to the Office of the Director would result in funding transfer of nearly \$1.4 billion, a budget greater than most of the individual institutes and centers.

While we recognize the need for program flexibility, we also oppose granting the Director the sole power to eliminate programs in the OD, such as the Office of AIDS Research, the Office of Behavioral and Social Sciences Research, or the Office on Women’s Health Research, each of which serve important coordinating and strategic planning roles. It would be a disservice to the scientific process if the offices within the Office of the Director were subject to change as each new political appointee joined the NIH. **APA recommends that this language be removed from the legislation or that additional safeguards or procedures be included to prevent disruption to the agency.**

With regard to NIH’s reporting requirements, we support the elimination of unnecessary reports, but suggest that NIH include an additional tracking mechanism to achieve greater transparency in the agency. NIH does not currently track the type of training undergone by its investigators, and such information could be useful in evaluating research training programs or developing new ones. **Therefore, APA suggests the committee request that NIH improve its ability to track this information as it implements new reporting requirements.** (see bill language #3).

Lastly, APA also supports the bridging program that would enhance cooperation between NIH and that National Science Foundation (NSF) as included in the discussion draft. However, the disciplines listed are not the only fields that could benefit from increased cooperation between the two agencies. NSF has long promoted multidisciplinary research between the physical and behavioral sciences, and the NIH-NSF collaboration should not exclude these sciences or the participation of the NSF Social, Behavioral and Economic Directorate. (See bill language #4 and report language #4).

Thank you for considering our comments on the proposed reauthorization. Please feel free to contact Pat Kobor at 202.336.5933 or Karen Studwell at 202.336-5585 if you should have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'NBA', followed by a long horizontal flourish.

Norman B. Anderson, PhD
Chief Executive Officer

APA Suggested Bill Language

1. Page 12, line 7, after “biomedical,” insert “and behavioral” and Page 22, line 4, after “biomedical,” insert “and behavioral”
2. Page 12, strike subsection (C)
3. Page 21, line 17 after “research entity managing the grant,” insert “disciplinary training of the investigator,”
4. Page 29, line 9, after “biological” add “and behavioral”

APA Suggested Report Language

1. *Basic research.* The Committee affirms the necessary and important contributions of basic or fundamental biomedical and behavioral research in the march toward prevention, treatment and cure of specific diseases. Basic research, whether using animal models or human populations, is understood to be a necessary part of the mix of research supported by NIH. Research on such basic mechanisms as how we learn, what degrades or enhances human memory, or how different types of stress may affect the immune system may affect the treatment of many different conditions. In prioritizing how federal dollars can have the greatest impact on improving human health, the Committee acknowledges that a portion of federal dollars must be allocated to finding answers to basic questions.
4. *Bridging sciences at NIH-NSF.* The Committee clarifies that demonstration projects to better integrate the physical and mathematical sciences now largely supported at NSF may involve behavioral and social science research at NIH or behavioral and social science collaborations with the physical and mathematical, social, behavioral and economic sciences at NSF.