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The Honorable Cathy McMorris Rodgers  
Chair, Committee on Energy & Commerce  
U.S. House of Representatives  
Washington, D.C. 20515

Via [NIHReform@mail.house.gov](mailto:NIHReform@mail.house.gov)

Dear Chair Rodgers,

On behalf of Boston University (BU), thank you for inviting feedback on your framework for discussion regarding the future of the National Institutes of Health (NIH).

BU scientists and engineers are pioneers in fields such as neuroscience, infectious disease, and engineering biology, successfully competing for more than \$150 million in NIH awards annually. Our lifesaving work would not be possible without the support of policymakers who share our goal of building on NIH's world-renowned strengths and investing in the future of American science.

We appreciate your request to identify opportunities to build an even stronger NIH for the future and share feedback on the following topics raised in your framework:

- **Structural reform:** We welcome your goal of ensuring that the organizational structure of NIH is aligned with current scientific understanding and public health challenges. However, we encourage Congress to utilize a scientific, independent process to guide any planned restructuring of the agency's institutes and centers. We recommend an evidence-based decision-making procedure built on consistent principles and criteria that supports the mission of the agency and engenders trust across the diverse NIH stakeholder community. An independent organization or federal advisory committee can consider whether any proposed change optimizes the ability of NIH to support research that improves human health. Such a process should be transparent, establish clear timelines, and allow for expert input as to where opportunities for better aligning NIH's structure with its mission may exist.
- **Funding reform:**
  - *Public Health Service Evaluation Set-Aside:* We support transparency about the use of the Public Health Service Evaluation Set-Aside, which – among other things – currently supports the budget of the National Institute of General Medical Sciences (NIGMS). This would ensure consistent and robust funding of the critical fundamental science and training programs at the NIH.
  - *Costs of research:* BU does not support the proposal to cap indirect costs to a percentage of the grant award, as this will severely harm grantees' ability to support and conduct high quality science. Facilities and administrative costs (F&A) are a critical component of the cost of conducting research. The current federal process for negotiating F&A rates is based on clear guidance from the Office of Management and Budget, with an accountability process built into the negotiation that documents costs that have already been incurred. F&A costs have risen not only due to the higher costs of supporting research infrastructure, but also to support the oversight mechanisms that help ensure and demonstrate grantees' stewardship of public

funds, such as protecting human subjects, implementing research security protocols, and ensuring research integrity.

- **Grant reform:**

- *Oversight of pathogen research:* As a national leader in research to combat infectious disease, BU appreciates the need to ensure such research is conducted safely and securely with appropriate accountability and oversight. We support the new United States Government Policy for Oversight of Dual Use Research of Concern and Pathogens with Enhanced Pandemic Potential produced by the White House Office of Science and Technology Policy (OSTP), which strengthens federal oversight and is based on considerable input from scientific stakeholders. We urge the Committee to consider how to codify and build on the existing OSTP guidance, rather than establishing an entirely new infrastructure for oversight.
- *Independent community review oversight boards:* BU appreciates the framework's support for community review boards. We proudly operate the National Emerging Infectious Diseases Laboratories (NEIDL), one of only two NIH-funded National Biocontainment Laboratories (NBL's) located at a university. The members of the NEIDL's Community Liaison Committee play a vital role in ensuring public participation and transparency in our operations and activities.

As we seek to maintain our global leadership in biomedical research and foster the discoveries that drive medical innovation, the optimization of the NIH is a complex and important issue. I hope the Committee will consider additional avenues for stakeholder engagement as you proceed, such as regional meetings, hearings, and additional requests for feedback on specific proposals. Thank you again for the invitation to work collaboratively on this important task.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Thomas Bifano', with a stylized flourish at the end.

Thomas Bifano  
Vice President and Associate Provost *ad interim* for Research