



Quality Life Through Research

Federation of American Societies for Experimental Biology

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*Representing over 100,000
biological and biomedical
researchers.*

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February 2, 2011

Lawrence A. Tabak, DDS, PhD
Principal Deputy Director
National Institutes of Health
Building 1, One Center Drive
Bethesda, MD 20892-0160

VIA EMAIL TO: lawrence.tabak@nih.gov

Dear Dr. Tabak:

The purpose of this letter is to provide members of the National Center for Research Resources (NCRR) Task Force and the National Center for Advancing Translational Sciences (NCATS) Working Group with input from the Federation of American Societies for Experimental Biology (FASEB) regarding the proposed creation of NCATS and the “straw model” for realigning NCRR programs. In these fiscally challenging times, we are concerned that these changes will result in a loss of necessary resources for the basic and translational research already supported within the NIH institutes and centers (ICs). We strongly advise against creating a new center if that center would disrupt or compete with the existing IC activities or reduce the funding available to them. As we stated in previous letters to the Scientific Management Review Board (SMRB), National Institutes of Health (NIH) Director Francis Collins, and Secretary of Health and Human Services Kathleen Sebelius, we are concerned that decisions related to the creation of NCATS are being made too rapidly and in the absence of a detailed analysis of the potential consequences. Although we maintain these concerns, we nonetheless are committed to working constructively with the agency to meet its translational research objectives and ensure the optimal realignment of programs currently housed within NCRR if NCATS is formed.

We also take this opportunity to comment on the importance of preserving both the missions and budgets of the NCRR programs not planned for inclusion in NCATS. These programs, which have been well served in NCRR, perform important functions in the biomedical research enterprise ranging from the development of research technologies to providing science education resources, and because they are not disease or organ specific, investigators spanning the full range of biomedical research rely upon them. As one area of particular interest to the FASEB community, model organism research has been, and continues to be, fundamental to the generation of medical breakthroughs. Animal models both elucidate basic biological mechanisms and are

standard tools in the testing of toxicity and efficacy in pre-clinical drug development. NCRR's Division of Comparative Medicine (DCM) plays the essential role of supporting the development, characterization, and management of animal models, including non-human primates. Because of the importance of animal models in drug development, the mission of the division naturally aligns with the Rapid Access to Interventional Development (RAID) program, which provides resources in the pre-clinical space and is one of the key proposed components of NCATS. Therefore, FASEB recommends that the organization of and funding for DCM remain intact and that the division be transferred to NCATS if NCRR is dissolved.

Other important trans-NIH programs include the Institutional Development Awards (IDeA) and Research Centers in Minority Institutions (RCMI). They fund research infrastructure and capacity building in underrepresented states and institutions across the spectrum of biomedical and behavioral research. Another example, the Knockout Mouse Project (KOMP)—which is generating a comprehensive, public repository of mouse embryonic stem cells containing knockout mutants for every gene in the mouse genome—is supported by 19 ICs. The Federation is concerned that the dissolution of NCRR and the redistribution of its portfolio into various ICs may compromise the broad utilization and functionality of those programs, which have specialized needs and require a unique management approach. We strongly recommend that these programs be placed in an organization dedicated to management of research resources intended to be used by the entire NIH community.

FASEB—the nation's largest coalition of biomedical scientists and engineers, representing 23 scientific societies and more than 100,000 researchers—appreciates NIH's dissemination of information via feedback.nih.gov and numerous stakeholder conference calls. The Federation is grateful for the opportunity to share our views on NCATS and the realignment of NCRR programs. We hope that the NCRR Task Force and NCATS Working Group will consider our recommendations, and we look forward to working together on these issues.

Sincerely,

A handwritten signature in black ink, appearing to read "William T. Talman". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

William T. Talman, MD
FASEB President

cc:

Eric Green, Director, National Human Genome Research Institute, National Institutes of Health
Alan Guttmacher, Director, Eunice Kennedy Shriver National Institute of Child Health and Human Development, National Institutes of Health
Thomas Insel, Director, National Institute of Mental Health, National Institutes of Health