

June 21, 2000

Stephen E. Straus, M.D.
Director, National Center for Complementary
and Alternative Medicine
Building 31, Room 5B41
31 Center Drive, MSC 2182
Bethesda, MD 20892

Dear Dr. Straus:

The Federation of American Societies for Experimental Biology (FASEB) welcomes the opportunity to offer comments on the National Center for Complementary and Alternative Medicine (NCCAM) Strategic Plan. FASEB is comprised of 21 professional scientific societies with more than 60,000 members, making it the largest coalition of biomedical research associations in the United States. FASEB's mission is to enhance the ability of biomedical and life scientists to improve, through their research, the health, well-being and productivity of all people.

FASEB supports NCCAM's intent to raise the level of scientific rigor, and we applaud the move toward more stringent evidence-based research throughout its broad portfolio. NCCAM's commitment to rigorous scientific investigation of unproven therapies is critical. Through sound scientific study, medical practices once thought to be non-conventional can become fully integrated into standard medical care. Well-designed scientific studies will also identify those therapies that offer no clinical benefit or are harmful to patients. This research is particularly important to assess the effects of herbal and dietary supplements. For the safety of consumers using these agents, we need to know more about their basic mechanisms of action.

While FASEB realizes that clinical research is the cornerstone of NCCAM's scientific portfolio, we believe that the growth in its budget offers an opportunity for a corresponding increase in basic research studies. Our understanding of basic mechanisms should not be independent of, or subordinate to, clinical research. Investigator-initiated research is an important part of NCCAM's plan and is critical in building a tradition of scientific rigor.

FASEB believes that for NCCAM to achieve its goals of integrating scientifically proven modalities and maintaining scientific credibility, it is important that biomedical research scientists and physician-scientists be appointed to the Advisory Council and Cancer Advisory Panel of NCCAM. Furthermore, not all modalities within NCCAM's current portfolio will be able to meet sufficient clinical testing standards of efficacy. NCCAM should reevaluate the priorities within its research portfolio and use its resources to investigate those issues that can be scientifically tested. Efforts to develop new medical school curriculum should involve medical educators and be limited to those therapies that have been proven to be effective in rigorous, scientific examinations.

The FASEB community is optimistic that your efforts will produce great change at NCCAM, raising the level of scientific inquiry to meet critical public health needs.

Sincerely,

David G. Kaufman, MD, PhD
FASEB President

Return to the [FASEB Office of Public Affairs](#) homepage