June 21, 2007

The Honorable Tom Harkin
Chair, Senate Committee on Agriculture, Nutrition and Forestry

The Honorable Collin Peterson
Chair, House Committee on Agriculture

United States Congress
Washington, DC

Dear Chairman Harkin and Chairman Peterson:

The Federation of American Societies for Experimental Biology (FASEB) strongly believes that greater investment in basic and applied agricultural research is essential, as the demand for a safer and more nutritious food supply continues to increase. FASEB comprises 21 professional scientific societies, representing more than 80,000 life science researchers. We appreciate the recent focus on research at the United States Department of Agriculture (USDA) and believe that the reauthorization of the Farm Bill presents a unique opportunity to strengthen the national system of agricultural research.

As the Farm Bill moves through the legislative process, FASEB respectfully requests that policymakers consider the following recommendations, which are aimed at maintaining and magnifying the breadth and competitive nature of the agricultural research portfolio, to ensure the United States’ economic vitality and the well-being of all Americans. Greater detail on these recommendations may be found below:

- A National Institute for Food and Agriculture (NIFA) should be established within the USDA to support competitive, fundamental research in agriculture;
- The administration of USDA research programs should be restructured for enhancement of coordination and quality of research programs. Both extramural and intramural research programs should be under the authority of a Chief Scientist, who would report directly to the Secretary and whose selection would be based on a strong background in scientific research;
- Any proposal to affect or eliminate formula funds must make long-term provision to support critical infrastructure programs currently made possible through this funding mechanism and compensate for the loss of leveraged state funds;
- Indirect cost support for USDA grants should be equivalent to that of other agencies, such as the National Science Foundation;
- Our nation’s agricultural research portfolio is critical to our economy and quality of life and should be supported at the highest possible levels, reversing the trend of neglect and underfunding.
National Institute for Food and Agriculture: FASEB fully endorses the establishment of a National Institute for Food and Agriculture (NIFA), within the USDA, dedicated to funding competitive, peer-reviewed basic research in agriculture. Basic research in agriculture establishes the scientific foundation required to provide a safe, nutritious food supply in a manner that reduces environmental pollution, promotes sustainable yields, improves human health and promotes the competitive position of U.S. agriculture in the global marketplace. This is an unparalleled opportunity to enhance our system of supporting high quality, fundamental research, allowing advancement of current knowledge and bolstering the superiority of American agriculture. However, in order to ensure success of such an endeavor, NIFA must be fully funded, in contrast to the current trend of underfunding that has plagued current agricultural research programs. Moreover, FASEB thinks that it would be both redundant and unnecessary for USDA to maintain two fundamental, competitive grants programs. Therefore, we would recommend that establishment of NIFA should replace rather than coexist with the competitive grants program of the National Research Initiative (NRI).

Restructuring of USDA research administration: FASEB does not support the recommendations outlined in the Administration’s Farm Bill proposal nor the CREATE-21 proposal. We feel strongly that the USDA proposal, in particular, would create a new bureaucratic layer to the detriment of research progress, while also eliminating program leaders who play distinct and important functions. That being said, the current administrative structure does not allow adequate coordination between the extramural research programs of the Cooperative State Research, Education, and Extension Service (CSREES) and the intramural programs of the Agriculture Research Service (ARS). This division has created an internally competitive environment that is not in the best interests of science or our national needs in agriculture. FASEB recommends the creation of a Chief Scientist position, appointed by the President, to administer the research portfolio of the USDA, including CSREES, ARS, and the newly formed NIFA. This individual should report directly to the Secretary of Agriculture and should be selected foremost for his/her strong scientific background. This model has worked tremendously well for other federal science agencies, including the National Institutes of Health (NIH) and the National Science Foundation (NSF), and FASEB believes such a change would foster a culture of scientific eminence and innovation in agriculture that will be of great benefit to our nation.

Formula funding: In the course of discussions related to the Research Title of the Farm Bill, the idea of eliminating or modifying formula funds has been raised. Universities and research institutions may use formula funds to provide the critical underpinning infrastructure which allows maximization of competitive research funding. While FASEB supports competitive funding generally, we acknowledge that research infrastructure needs to exist for which a competitive mechanism would be unsuitable, such as the maintenance of nutrition monitoring databases. Furthermore, we recognize that there is variation in the use of formula funds by universities and research institutions and that these funds may be used in ways that greatly benefit agricultural science, including the funding of pilot grants for new investigators. In addition, the leveraging of state dollars mandated through use of formula funds is an important component in the continuous generation of new knowledge that allows for sustainable progress towards meeting national needs. Any proposal to affect or eliminate formula funds must make long-term provision to support the programs currently made possible through this funding mechanism. Research programs need to remain structured in a way that will allow flexibility to meet local or regional needs, as well as to provide rapid response to emerging issues.

Indirect costs: Scientific excellence is dependent upon rigorous merit review and FASEB has long been a vocal supporter of competitive, peer-reviewed research. Yet, USDA research grants are not themselves competitive in comparison to other federal funding agencies because of the low rate of indirect cost support associated with these awards. In order to attract the best and the brightest minds to address our most pressing national challenges, indirect cost support for USDA grants should be equivalent to that of other federal science agencies, such as NSF and NIH. However, FASEB also believes that USDA
research programs deserve to be supported at the highest possible levels and that changes in the indirect cost structure should not come at the expense of research dollars or number of grants supported.

Agriculture and the research which advances it remain of crucial importance to our economy and quality of life. In recent years, our nation’s investment in agricultural research has been declining, threatening our ability to sustain the vitality of our research portfolio. Continuation of this neglect will inevitably undermine the success of the USDA’s research programs. The reauthorization of the Farm Bill is an opportune time for revitalization and improvement of our agricultural research system. FASEB believes the recommendations outlined above will not only ensure the highest quality agricultural research, but enable a protected, nutritious food supply and maintain the United States’ global preeminence in agriculture.

The expertise of FASEB’s societies and scientists is at your service. If there is any way in which we may assist, please let us know. We look forward to working with you and your colleagues as the development of the Farm Bill continues.

Sincerely,

[Signature]

Leo T. Furcht, M.D.
FASEB President