

August 12, 2026

Comments submitted electronically to Drugs@finance.senate.gov

The Honorable Ron Wyden
Ranking Member
Senate Finance Committee
219 Dirksen Senate Office Building
Washington, DC 20510

Dear Ranking Member Wyden:

The Federation of American Societies for Experimental Biology (FASEB) is comprised of 21 scientific member societies representing more than 100,000 researchers with a common vision for advancing health and well-being through research and education in the foundational biological and biomedical sciences. We are providing comments to your [Request for Information](#) (RFI): [Commonsense Policy Options to Lower Drug Prices for Patients](#), released on June 16, 2026. In our comments, we focus on a specific subset of issues in the RFI, centered around these four broad themes: bolstering biopharmaceutical innovation in the United States, basic research, addressing competition from China and our need for scientific talent, and lessons from Inflation Reduction Act and CHIPS and Science Act.

I. Bolstering Biopharmaceutical Innovation in the United States

Foundational biological and biomedical research leads to biopharmaceutical innovation. As such, we encourage Congress to provide robust, sustained, and growing funding year-over-year to keep NIH and all agencies funding biological and biomedical sciences on an upward trend, to meet the pressing health challenges our nation faces, and to attract and retain a strong pipeline of biomedical researchers at all career stages.

FASEB annually recommends funding levels for key federal agencies and programs. For FY 2027 [FASEB recommends](#) at least \$51.3 billion for the National Institutes of Health, at least \$11.89 billion for [National Science Foundation](#), at least \$1.2 billion for [Veterans Affairs](#) Medical and Prosthetic Research Program, at least \$539 million for [United States Department of Agriculture and Food Research Initiative](#), and at least \$10.06 billion for the [Department of Energy Office of Science](#).

II. Basic Research

Basic research expands the understanding of biological systems and significant evidence shows it drives innovation and the [economic engine](#). We have outlined here seven key topics that require Congressional consideration.

1. Rigor and reproducibility are fundamental to scientific progress and the foundations of public trust. FASEB has long supported efforts to strengthen rigor and reproducibility through high-quality peer-reviewed publications, data reporting, improved study design, transparency, and appropriate authentication of research resources. Rigor and reproducibility require an infrastructure that enables high-quality science to be stewarded over the long term, and we encourage NIH to continue to ensure that research output remains accessible, interoperable, and useful over time. We also encourage NIH to give researchers appropriate credit and recognition for developing the spectrum of resources that enable future discoveries.
2. There also remains a need for continued investments in shared research resources - including core facilities, shared instrumentation, biobanks, animal facilities, data resources, stock centers, and specialized technical staff. These are essential infrastructures and they require more stable funding, better recognition, and coordinated national policies. Data, software, and computational models that accelerate discovery by enabling validation, reuse, and new lines of investigation are also needed. NIH has made considerable progress through its Data Management and Sharing Policy and related initiatives. Congress can ask NIH to demonstrate how it is rewarding researchers' contributions to the production of data, software, and computational models as scholarly products alongside the value of peer-reviewed publications both in funding decisions and progress reporting.
3. Collaboration is a defining feature of basic research. Many assessment systems continue to reward primarily individual achievement. Congress should encourage team science in ways where the value of collaboration is measured through the integration of expertise and the scientific advances it enables, not in the number of collaborators or coauthors. Metrics that measure solely coauthor counts, network size, or other quantitative proxies are poor indicators of meaningful collaboration and may encourage honorary authorship or unnecessary expansion of research teams. We encourage stakeholders to avoid promoting limited metrics that create unintended consequences.
4. As artificial intelligence and computational modeling become increasingly integrated in basic research, Congress should encourage NIH to require documentation of model

provenance, versioning, and training data. These practices will improve transparency, reproducibility, and confidence in AI-enabled research.

5. There remains a continuing need to leverage the best available methodologies, which may involve both humane animal research and New Approach Methodologies (NAMs) to answer critical biomedical research questions. In making this recommendation, FASEB recognizes both the rapid pace at which biomedical research is advancing and NIH's forward-thinking approach to investing in and using NAMs in future biomedical research studies. For most fields, the most rigorous scientific answers will require some combination of animal models and NAMs, each contributing where it is best suited. In a regulatory context specifically, NAMs must be validated – using carefully selected benchmarks, which may include animal models as a base comparator – before they can serve as primary tools for testing safety and efficacy. Clarifying the research contexts in which NAMs are most valuable, and the standards required for them to take on a larger role in regulatory decision-making, is a crucial step in setting appropriate end-user and public expectations as validation strategies, metrics, and regulatory pathways continue to mature. FASEB has identified three central themes to aid policymakers and NIH in outlining future areas of investment:

Theme 1. Establish uniform validation guidelines and consider parallel investments in validation studies when funding NAMs to ensure new technologies are well-characterized with clear endpoints and metrics.

Theme 2. Develop NAM-specific reporting and data sharing guidelines that acknowledge the rigor, reproducibility, and translatability challenges associated with nonanimal models.

Theme 3. Strengthen partnerships between federal agencies, industry, scientific societies, and animal researchers to exchange best practices, minimize regulatory burden, and ensure equitable implementation.

6. We cannot stress highly enough the urgent need for **stable** and **robust, growing** federal funding of research. FASEB and many other organizations endorsed Senator Dick Durbin's [American Cures Act S. 4494](#) introduced on May 12, 2026. American Cures would guarantee stable long-term funding for biomedical research to NIH, CDC, DoD, and VA by replacing the current unpredictable annual appropriations process with a mandatory growth mechanism (inflation plus 5%). FASEB has previously stated in its 2025 [response](#) to Senators Rounds' and Heinrich's [RFI](#) on the American Science

Acceleration Project that adopting a funding strategy allowing real growth could address emerging research priorities and help investigators plan projects more effectively.

7. Biomedical innovation is reliant on basic research, and both are under threat from the proposed changes to the “[Regulation for Federal Financial Assistance](#)” published in the Federal Register on May 29, 2026 (91 Fed. Reg. 32198). This notice of proposed rulemaking is a wholesale proposed restructuring of federal financial assistance, and would negatively impact academic research institutions, scientists, and scholarly societies – and cities, counties, and states. The proposed rule is scheduled for implementation October 1, 2026, after only a brief 45-day comment period. **FASEB submitted [comments](#) urging full withdrawal of the proposed rule, citing multiple provisions that individually and collectively would be damaging. We strongly urge Congress to block this proposed rule.** We encourage you to read our full comments; however, several issues specifically in your RFI in this section are related to specific concerns in those comments, and we have highlighted those below.

FASEB agrees that improved oversight of grant making is important; however, such oversight should not remove the time-tested review and decisioning of grants from the hands of peers under the scientific peer review process. The proposed OMB rule would have expert review of the best science be overridden by a political appointee’s review of an award - one person’s judgement presiding over a group of unbiased scientific experts dedicated to advancing science. This would weaken the foundation of scientific progress in the U.S. and is contradicted by Executive Order 14303, which calls for “*unbiased peer review*” and “*without conflicts of interest.*”

FASEB and many other scholarly societies in the U.S. foster basic foundational research by organizing and running scientific research conferences, by producing and distributing policy resources, through educational initiatives, and by producing high-quality peer-reviewed scientific publications. Scientific scholarly societies in the U.S. are a foundational backbone of the scientific workforce pipeline, drive downstream positive economic impacts, all while reinvesting all their resources back into additional efforts to educate, develop, and incentivize the workforce. The proposed OMB changes would structurally defund scholarly societies, targeting every single source of revenue that societies bring in to meet their nonprofit missions. Many of these societies were founded in the U.S. over a century ago, including FASEB, and have contributed over the years to advancing science and driving the U.S. economic engine. We urge Congress to preserve the allowability of reasonable publication, conference, and scientific society costs, without additional administrative burdens.

We also encourage Congress to ensure that the OMB withdraws or substantially narrows the categorical restriction on international research collaboration (proposed 2 CRF

200.216; 200.220), replacing it with the existing, tailored statutory provisions rather than a universal prohibition without guardrails.

III. Addressing Competition from China and our Need for Scientific Talent

[The National Science Board's](#) Science & Engineering (S&E) Indicators 2024 report, and previous reports, have raised serious concerns about an erosion in leadership on science and engineering metrics for the U.S. Those same reports now show China has surpassed the US in research output, STEM talent production, research publications, and patents, demonstrating a shift from the West to the East. This transition has occurred during the U.S. national political debate over restricting collaboration with other countries due to national security concerns, and actions may lead to driving away talent and restricting information sharing unnecessarily and to the harm of U.S. driven science. Significant new investments are needed to protect U.S. innovation, and the private sector will not be able to achieve those goals without U.S. government federal investments. The U.S. is also seen at an inflection point in areas such as AI and biotechnology, making our recommendation for significant investments in the biological and biomedical sciences an even more urgent and time-sensitive priority.

FASEB has a long-standing commitment to developing and growing the U.S. [scientific workforce](#) and are well-aware of the U.S. need to attract, develop, and retain scientific talent. We have repeatedly emphasized the importance of maintaining and growing the U.S. scientific talent pipeline, especially early career researchers, graduate students, post docs, and international scientific talent. A successful workforce requires stable and predictable grant funding (as addressed in section I and section II, point 6), research environments that provide technical training and career development for investigators, and shared facilities that broaden access to advanced technologies (section II, points 2 and 3).

In March 2025, a self-selected reader [survey](#) of 1,600 scientists found that 75% of responding U.S. based scientists said they were considering leaving the country. This result describes an environment that is not conducive to research. The U.S. cannot afford to continue in this fashion if the [administration](#) aims to be the global leader in emerging technologies—including artificial intelligence, quantum information science, nuclear technologies, space exploration, telecommunications, biotechnology, advanced transportation, and advanced manufacturing. All are critical to American competitiveness, described as the “Industries of the Future.”

The science, technology, engineering, and mathematics (STEM) workforce relies on a continuous pipeline of graduate students and postdoctoral scholars, and international researchers play a critical role in sustaining the U.S. research and development enterprise. Data from the National Science Foundation (NSF) show that a large share of temporary visa holders who earn U.S. science and engineering doctorates remain in the country for subsequent

employment, directly contributing to our economy and strengthening the U.S. innovation ecosystem. Roughly three-quarters [report](#) plans to stay in the U.S. for employment or postdoctoral research immediately after graduation; and about 70% remain employed in the U.S. a decade later. Looking ahead, the U.S. Bureau of Labor Statistics [projects](#) that STEM occupations will grow by 8.1% between 2024 and 2034, compared to just 2.7% growth across non-STEM occupations. Meeting this rising demand will depend on our ability as a nation to recruit and retain top global talent. If international scholars go elsewhere, the U.S. will fall behind on many fronts - medical breakthroughs, technology development, and economic security.

Key to our STEM workforce is the continuing [support of international scholars](#). Allowing them to continue their studies in the United States plays a critical role in the U.S. research enterprise; policies impacting this group of scholars should seek input from stakeholders. Scholars are already subject to an extensive vetting process before being granted a visa. [The National Science Board Vision 2030](#) states, *"to lead in science and engineering and remain globally competitive, the U.S must be a STEM talent powerhouse that uses a two-pronged strategy of expanding domestic talent while continuing to attract and retain global talent."* In practice, the NSF and NIH both do this. At the same time, the administration continues to seek billions of dollars in FY 2027 cuts to these agencies – down more than \$4 billion for NSF and roughly \$6 billion for NIH. We strongly urge Congress to oppose these cuts and continue to grow resources provided for the scientific agencies.

It is also important that the U.S. continue to attract new international students and researchers. The U.S. Government has issued a [final rule](#) ending duration of stay for F (academic) and J (exchange visitors) visa status to take effect on Sep. 15, 2026. Under the old system, F&J holders were allowed to stay as long as was required to complete their academic program rather than fixed term without consideration of the normal timelines to degree completion, which can vary by discipline. International students often choose the U.S. because the flexibility of "duration of stay" allows them to complete their training without the constant threat of disruption. If talented young scientists no longer view the U.S. as a viable or welcoming option because they may lose visa status prior to degree completion, they will take their skills elsewhere, and our nation will forfeit both their research contributions and the long-term economic benefits of retaining them in our workforce. We believe international scholars are vital to the research enterprise and that Congress should withhold funds from implementation of this final rule.

The U.S. must also look at early-career researchers. Recent analyses have demonstrated that the level of career instability within the biomedical sciences has increased. Facing diminishing career prospects, many early career researchers are leaving science entirely, reducing the return on the U.S. investment in the training of these individuals and the establishment of their research programs. The loss of researchers and the termination of promising and productive

lines of inquiry is wasteful of U.S. taxpayer resources. The technical skills and expertise acquired by each individual will need to be replaced, increasing the cost of research and delaying discovery. We urge Congress to consider these impacts and foster encouraging environments for all researchers.

FASEB also strongly urges Congress to continue to support the implementation of programs and funding mechanisms to better support early-career investigators, particularly those that enhance career development and foster the skills needed. The NIH's [Stephen I. Katz Early-Stage Investigator Research Project Grant](#) and [Maximizing Investigators' Research Award](#) are excellent examples of providing flexibility for early-career investigators to pursue new research directions with the stability and support they need as they transition to independent careers. These mechanisms offer distinct advantages for new investigators, such as longer award length and a reduced reliance on extensive preliminary data. Additional funding mechanisms with similar features can reinforce support for early-career investigators at a critical point in their careers, thereby enhancing scientific productivity and the potential for important breakthroughs.

FASEB is the recipient of one of the Maximizing Opportunities for Scientific and Academic Independent Careers (MOSAIC) programs funded by the National Institute of General Medical Sciences (NIGMS). We urge continued support for this unique program. Providing postdoctoral scholars with a cohort and access to professional development programming will assist in creating community and developing job readiness for these scholars. During the February 2021 Advisory Council meeting, the NIGMS highlighted that the first round of MOSAIC K99 applicants was 75% female and 76% underrepresented minorities. We encourage future cohorts of MOSAIC scholars and the evaluation of program success both in job placement and the establishment of professional networks by providing social support.

IV. Lessons from the Inflation Reduction Act and CHIPS and Science Act

We focus our comments on the CHIPS and Science Act. The [CHIPS and Science Act of 2022](#) (P.L. 117-167) recognized that our scientific leadership depends on both discovery and talent. CHIPS and Science expanded graduate education and traineeships, and recognized biotechnology as a key technology focus area. The Act also created the NSF TIP Directorate that supports translational research, technology transfer, and partnerships; and broadened participation by expanding support for populations and institutions historically underrepresented in STEM. Lastly, it authorized regional innovation efforts for higher education, industry, and local governments. These are important advances.

Additionally, the CHIPS and Science Act provided authorized increases in research spending. FASEB views the law's authorized increases for the NSF and the Department of Energy (DOE) Office of Science as important indicators to appropriators that funding should be provided as

authorized. Per the Act, [NSF](#) funding could have been [doubled over the FY 2023-2027](#) timeframe, a 5- year growth of approximately \$81 billion, and the [DOE Office of Science](#) would have grown by [nearly \\$50 billion](#) based on the authorization levels over that same time, positioning the U.S. to continue to lead globally in a competitive environment where other nations are aggressively growing their scientific research investments. However, this has not happened despite the Congressionally stated desire to provide such funding. One key lesson from the outcome of the CHIPS and Science Act is a reminder that authorization by Congress did not necessarily result in subsequent appropriations by Congress. We encourage finding bipartisan and lasting paths forward to authorize and to appropriate the funding for scientific research.

Thank you for the opportunity to submit our feedback for your consideration. We stand ready to provide any additional information to support the U.S. Congress and its efforts to authorize and appropriate funds for foundational biological and biomedical research.

Respectfully Submitted,



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