FASEB
Federation of American Societies for Experimental Biology

Representing Over 110,000 Researchers

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February 12, 2026

The Honorable Bill Cassidy, Chairman
Senate Health, Education, Labor and
Pensions Committee
428 Senate Dirksen Office Building
Washington, DC 20510

Dear Chairman Cassidy:

As an organization representing 22 scientific societies and over 110,000 individual researchers in the biological and biomedical sciences, the Federation of American Societies for Experimental Biology (FASEB) thanks you for holding the February 3, 2026 hearing with National Institutes of Health (NIH) Director Jayanta Bhattacharay, M.D., PH.D. on "Modernizing the National Institutes of Health: Faster Discoveries, More Cures." We especially appreciated that your opening remarks acknowledged the recent actions at NIH that may have "….create[d] uncertainty within the American research enterprise and undermine[d] the agency's ability to serve the public." FASEB agrees with your statement and has also heard from scientists throughout the United States who have been directly affected by NIH's actions last year including experiencing grant terminations and cancellations.

As you also noted in your opening statement, you released a white paper in May 2024 containing ideas from those who worked with NIH, as well as other external stakeholders, about how to modernize the agency to make it better able to fulfill its mission and deliver more lifesaving cures. FASEB was pleased to respond to your September 29, 2023 letter seeking input on modernizing NIH and would like to further elaborate and reiterate our previous views with the following additional information.

First and foremost, congressional and administration attempts to modernize NIH should involve continual and current input from stakeholders that reflects the current operational status of NIH, which has undergone massive changes under the current Trump administration. The number of institutes and centers is one area of modernization that needs careful deliberation before making an abrupt change and fully understanding the impact of any change should be clear to both Congress and the American public prior to implementation.

Second, bicameral and bipartisan efforts should be made to ensure members of Congress and stakeholders have the opportunity to provide their thoughts to shape a modernized NIH structure that leads to faster and better scientific innovation while still maintaining certain principles. Below I am laying out these principles.

Supporting Early Career Researchers

NIH offers various funding opportunities for early-career researchers such as training grants and career transition awards that allow them to move from mentored positions into independent research roles creating momentum for their scientific careers. These efforts allow NIH to foster the next generation of scientists, which the United States needs to keep pace with global scientific innovation in the biological sciences among other disciplines. FASEB strongly supports the continuation of existing NIH programs for early-career researchers and the development of new opportunities to ensure that the agency is contributing to the creation of a robust biomedical research workforce.

Maintaining An Adequate Facilities and Administrative Cost Structure

NIH announced application of a 15 percent rate for Facilities and Administration (F&A) costs for all existing and new grants to institutions of higher education effective February 10, 2025, a move that conflicts with existing rates contracted between institutions and the Department of Health and Human Services. For the majority of research institutions, this flat F&A rate represents a minimum 50 percent decrease in funds that support the facilities where research is conducted. These funds cover maintenance of shared equipment and resources, compliance with measures to ensure patient privacy and research security, and utilities, such as appropriate management of biohazardous materials. These are real costs that if not adequately reimbursed by the government will stymie the pursuit of research at universities, nonprofit laboratories, medical centers and other entities eligible for Federal research awards and also risk the safety of those working in or with research facilities.

FASEB joined others partners in the biomedical research community calling on the administration to rescind this action. In addition, the bipartisan, bicameral FY 2026 Labor, Health and Human Services, Education and Related Agencies (H.R. 7148) bill, section 224, prohibits the Department of Health and Human Services or any department or agency from developing or implementing a modified approach to such provisions in part 75 of title 45, Code of Federal Regulations, or to intentionally or substantially expand the fiscal effect of the approval of such deviations from negotiated rates beyond the proportional effect of such approvals in the third quarter of FY 2017. Once enacted into law, this language would allow Congress to stop this effort while still agreeing that indirect cost recovery has been essential for supporting research and acknowledging there is room for improvement in the system used to identify and recover indirect cost rates under the Uniform Grant Guidance, particularly with respect to the need for greater transparency into these costs. FASEB supports the language in section 224 of HR 7148 and is grateful to Congress for allowing more time for a compromise agreement on F&A costs to be reached between stakeholders and the administration.

Use of Animals in Research and New Alternative Methods

NIH created the Office of Research Innovation and Application (ORIVA) to ensure the standardization and validation of new alternative methods (NAM)-*in vitro, in silico*. FASEB applauded this initiative but cautioned against prematurely removing animal research from the scientific toolkit in lieu of approaches not yet ready to address important biomedical inquiries in full. Reviews into the current state of biomedical methodologies repeatedly highlight the continued need for animal studies alongside development of NAMs and warned that this initiative has the potential to hamper American biomedical and life sciences if it is not done with care. In light of this, FASEB has three recommendations pursuant to our June 4, 2025 letter to the NIH Director regarding NIH's initiative to reduce animal research:

- FASEB urged NIH to consider complete replacement of animal research only for systems in which validated NAMs can perform as well or better than the accepted animal models and promote the use of multimodal systems that include both animal models and NAMs where this is not possible.
- FASEB emphasizes the need for a case by-case assessment to ensure that any mandated replacement of animal models maintains the scientific rigor, safety, and reliability required to advance human health. Many alternative methods are not yet equipped to capture the temporal aspects of disease – namely, onset, latency, complexity, and progression of a disease – and require a longitudinal, systemic view that NAMs cannot currently provide.
- FASEB encouraged NIH to proactively include the voices of investigators, especially those working at the intersection of NAM development and animal model refinement, to guide the

roll out of this initiative.[1]

Multiyear Funding

Multiyear funding is a mechanism where NIH provides the entire budget for a grant upon the initial award rather than distributing it annually. Historically, NIH has not used this mechanism for funding research project grants. This approach enhances long term stability for complex research such as longitudinal studies and clinical trials, creates predictability for institutions and investigators, and reduces administrative burden on researchers who can focus more on science and less paperwork. However, there are drawbacks such as funding fewer grants, disproportionately harming early career researchers, limiting congressional oversight by reducing Congress's ability to redirect priorities annually, and potentially hampering NIH's ability to respond to emerging public health threats by funding new scientific opportunities.

The FY 2026 NIH budget overview stated, "In FY 2026, the Budget will continue the FY 2025 policy of reserving half of the NIH budget allocation for competing research project grants (RPGs) for awards that fully fund their outyear commitments as part of the initial grant obligation, to facilitate efficient management of resources across multiple years. Providing the grantee with funding for every year of the RPG from the start will increase NIH budget flexibility by no longer encumbering large portions of each year's appropriation for the continuation of research projects that were initiated in previous years."[2]

FASEB applauds the work of Congress in the bicameral, bipartisan FY 2026 Labor, Health and Human Services, Education and Related Agencies (H.R. 7148) bill, section 240, which states the amount of funds NIH obligates in FY 2026 using multiyear funding cannot exceed the amount obligated under the same method for FY 2025. We recommend that Congress monitor this situation closely to understand the full impact of this process and obtain the necessary NIH data that demonstrates the benefits outweigh the harm and if this is not the case, institute changes with stakeholder input that corrects the situation.

Please contact Ellen Kuo, Associate Director of Legislative Affairs (ekuo@faseb.org), if FASEB can provide any further information related to NIH modernization.

Sincerely,

Eric E. Kelley

Eric Kelley, Ph.D.
President, FASEB

cc: The Honorable Bernie Sanders
Ranking Member, Senate Committee on Health, Education, Labor and Pensions

[1] FASEB-Letter-to-NIH-Director-June2025.pdf
[2] NIH FY 2026 CJ Overview.pdf page 5