FASEB
Federation of American Societies for Experimental Biology

Representing Over 100,000 Researchers

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Response Submitted to the Request for Information (RFI) on the National Institutes of Health (NIH) Wide Strategic Plan for Fiscal Years 2027-2031

Priority Area 1: Research Areas

Overall, FASEB agrees that the proposed goals within Priority Area 1: Research Areas align with the NIH mission. However, we are concerned that the emphasis on applied or translational research in two of the three goals signals a potential shift in future funding priorities. NIH's long-standing commitment to supporting research investigating the underlying mechanisms of human biology has furthered scientific understanding and identified new strategies for treating and curing diseases, recent examples being the expanded utility of GLP-1s and development of immunotherapies. To ensure NIH continues to support a robust discovery pipeline, we urge the agency to maintain the current ratio of grants supporting foundational research versus those supporting clinical applications at approximately 60 – 40 and guided by scientific merit.

FASEB views this Priority Area as an opportunity to promote the role of basic research in informing evidence-based, validated methods in diagnosis, treatment and prevention of disease. Efforts funded across NIH's 27 Institutes and Centers highlight the value of studying biological questions from different perspectives and among different populations. Thus, we recommend that all three goals within this Priority Area highlight the need to assess research findings and test interventions in diverse populations to fully understand their long-term implications. Similarly, we encourage incorporation of language of how the strategic plans of individual Institutes, Centers, and Offices will be integrated into this Priority Area to facilitate collaborative and complementary efforts.

Animal models remain essential to basic research across many fields, enabling investigators to study the full complexity of living systems in ways that current alternative methodologies cannot replicate. FASEB urges NIH to sustain support for the full range of research models and to ensure that decisions about their use are grounded in scientific evidence. The development of safe and effective therapies depends on a robust preclinical research continuum. FASEB urges NIH to protect all scientifically relevant preclinical research tools — including nonhuman primate studies — and to ensure that complete replacement of animal research occurs only for systems in which validated novel alternative methods (NAMS) can perform as well or better than the accepted animal models.

Priority Area 2: Research Capacity

FASEB agrees with the proposed prioritization of research capacity building within the agency-wide strategic plan, and the Federation has a long history of supporting efforts to develop and sustain a research workforce committed to rigorous experimental design and prepared to utilize a range of approaches and tools to solve scientific questions. Decades of investment in research capacity – spurred by partnership between NIH and research and patient communities – established the U.S. as a leader in biomedical research. Stalled investments jeopardized this status in the early 2000s; however, this

leadership is at an even greater risk following the implementation of policies that abruptly altered the research landscape. Many of the programs previously in place to foster development of the next generation of researchers – particularly those in regions with fewer research resources – were eliminated in the past year due to nonalignment with administration priorities. Thus, part of this priority area must include efforts to preserve policies that support continuous funding and do not harm early-stage investigators while retaining and rebuilding trust with a generation of early-career researchers who are unsure whether there is a place for them and their research in the NIH funding portfolio.

FASEB also urges NIH to protect and strengthen shared research infrastructure, including the National Primate Research Centers and other animal research/care facilities, and to ensure that any changes to federal support for research resources are grounded in scientific evidence and developed in transparent consultation with the research community. Proposals to repurpose or defund critical research infrastructure in the absence of validated alternatives would stymie American biomedical progress and compromise animal welfare.

Similarly, FASEB supports responsible integration of NAMs into the research enterprise and recommends NIH ensures that investments in emerging methodologies complement, rather than displace, the infrastructure and oversight systems that ensure ethical, high-quality animal research.

Priority Area 3: Research Operations

On the surface, FASEB agrees with the intention of including Research Operations as part of an agency-wide strategic plan. However, given the experience of the past year, during which numerous critical checkpoints intended to ensure proper stewardship and transparency of research supported by American taxpayers were ignored or even eliminated, we are skeptical of what steps the agency would take in this current iteration to fulfill these goals. The active reduction of federal advisory committees coupled with significant delays in appointing experts to serve on Institute and Center Advisory Councils – Congressionally mandated as part of NIH's two-part peer review process – is antithetical to the goals in this priority area.

While Goal 2 is rightfully focused on fostering transparency and accountability to improve public trust in science, what is missing is a comparable goal focused on building the same with the research community. This gap has been particularly notable in the past year during which agency-wide communications were consolidated, significantly reduced, or even absent. The community certainly appreciates efforts to streamline communications, particularly when it simplifies processes associated with grant applications; however, NIH can best serve the research community when it is viewed as a partner. Several significant policy changes affecting issues ranging from multi-year funding and peer review processes to animal research were implemented over the past year without formal opportunities for public input – actively decreasing transparency in decision making. Therefore, FASEB urges NIH to

utilize structured, transparent mechanisms — including public comment periods — for engaging the research community on policy changes that affect research methodology, infrastructure, and oversight.

FASEB recognizes NIH's need to consider multiple factors, including portfolio balance, in funding decisions, but scientific merit should be the primary basis for those decisions. In addition, peer review must be the foundation for recognizing scientific merit and identifying the research that represents the best investment of federal dollars within the scope of NIH's mission.

Evidence-based decision making must govern any transition in research methodology. FASEB supports NIH investment in the development and validation of new approach methodologies (NAMs); however, methodological transitions should be required only where scientific readiness has been clearly established. Decisions to de-prioritize or restrict animal research before validated alternatives are available risk compromising scientific rigor and slowing progress toward NIH's public health mission.

Similarly, public trust in science depends on accurate, evidence-based communication about research methods and their limitations. Thus, FASEB urges NIH to ensure that all public communications and policy decisions regarding research models — including animal research and NAMs — reflect the current state of the science and are free from ideological or political influence.