Research!America's Comments on the Request for Information on the Notice to Announce NIH Updated Policy Guidance for Subaward/Consortium

On behalf of Research!America, thank you for your good faith efforts to maximize research stewardship, accountability, and transparency. While we support the intent behind the updated guidance, we are deeply concerned by the unintended consequences the revised reporting requirements would produce, including: 1) significant additional, taxpayer- borne administrative costs, which will reduce the funding and time devoted to research itself; 2)the disincentive for international partners to engage in research partnerships with the U.S., even as China and other economic competitors aggressively seek those partnerships out; 3) diminished global research inclusiveness (research institutions in under-resourced nations are the most ill-equipped to meet the new reporting requirements), despite the proven role of inclusiveness in accelerating progress against both infectious and non-infectious diseases that rob Americans of hope, health, and time; and 4) the counter-strategic impact on our nation's biodefense capabilities, which necessarily include on-the-ground research and surveillance partnerships in regions of the world where biodefense threats will -- not could – emerge.

We believe it is crucially important to modify the new reporting protocol in a manner that meets NIH's objectives without slowing the pace of medical progress or contravening U.S. strategic and economic interests. Knowing that timely action is important, we respectfully request that NIH convene cross-sectoral stakeholders as soon as possible to identify an effective, operable, and strategic solution. If the October 1, 2023 effective date for the new requirements precludes making needed changes, we urge you to extend the deadline until these changes can be identified and applied. Thank you for your efforts on behalf of NIH to advance the health and wellbeing of us all, and for considering our views on this important topic.