

Association of Independent Research Institutes (AIRI)

Response to RFI on feedback for the NIH-Wide Strategic Plan for Fiscal Years (FYs) 2027-2031

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Please include any comments on NIH's Goals across the three Priorities articulated in the Strategic Plan Framework, including potential benefits, drawbacks or challenges, and other areas of focus for consideration.

Priority 1: Research Areas (500 words)

- Goal 1: Advance Foundational Knowledge of Human Health and Disease
- Goal 2: Prevent Disease and Promote Health Across the Lifespan
- Goal 3: Advance and Optimize Interventions, Treatments, and Cures

AIRI is a national organization of more than 80 independent, nonprofit research institutes conducting basic, translational, and clinical research across the biological, behavioral, and life sciences. Our institutes vary widely in size and scientific focus, but all share a research-intensive mission and governance structures that allow them to remain nimble, pivot quickly to emerging scientific opportunities, and sustain long-term discovery. This flexibility, combined with the strong NIH funded research portfolio across our institutions, positions independent research institutes as essential partners in advancing NIH's strategic goals.

AIRI supports NIH's emphasis on advancing foundational knowledge of human health and disease, promoting health across the lifespan, and optimizing interventions, treatments, and cures. Independent research institutes are uniquely equipped to contribute to these goals. Their collaborative culture, shared infrastructure, and ability to rapidly reorient research programs enable them to drive innovation in biomedical science, biotechnology, and translational and clinical research. NIH investments have enabled breakthroughs in rare diseases, metabolism, neuroscience, cancer, and mental health, and continued strategic

investment is essential to sustain this progress and address challenges such as Alzheimer's disease, emerging infectious disease, and chronic illness.

AIRI recognizes the transformative potential of data science and emerging technologies. Priority research areas like artificial intelligence/machine learning, quantum science, and biotechnology increasingly rely on high-throughput tools with significant demands on data storage, management, and analysis. NIH's leadership in developing ethical standards, shared infrastructure, and tools to manage and analyze these data will be critical to ensuring that investigators across all institutions can fully leverage these technologies. AIRI believes NIH has a key role in structuring this process and agrees it should be a high priority across all institutes.

To achieve a healthier population, the NIH Strategic Plan must expand targeted investments in fundamental discovery research. Fundamental discovery drives advances in disease diagnosis, treatment, and prevention and has fueled U.S. leadership in biomedical innovation. In addition to the continued use of investigator-initiated research, NIH should continue to rely on targeted NOFOs to drive areas of high importance in biomedical interest. Some priority areas of interest to AIRI members like completing high-resolution mapping of the human brain to accelerate progress against Alzheimer's and Parkinson's disease; characterizing cancer's whole-body impacts; and harnessing insights from neuroscience to advance biologically informed artificial intelligence rely on targeted NOFOs to drive the respective fields.

Priority 2: Research Capacity (500 words)

- Goal 1: Develop and Sustain an Interdisciplinary Research Workforce
- Goal 2: Build, Improve, and Sustain Research Resources and Infrastructure

While the primary function of our institutions is research-driven, independent research institutes play a critical role in sustaining the nation's biomedical workforce and research infrastructure. Ensuring that NIH's Strategic Plan strengthens research capacity across all institution types is essential to maintaining U.S. scientific competitiveness and advancing NIH's strategic priorities. Independent research institutes train and employ a significant portion of the biomedical workforce, including graduate students, postdoctoral fellows, early-career investigators, and technical staff. In addition, AIRI member institutes are located across the country in many small and less-populated states. This provides the opportunity for our institutes to leverage partnerships and workforce opportunities within communities that do not have major academic research institutions. We encourage NIH to provide opportunities for independent research institutes located in these areas to engage in partnerships that are unique to those communities most likely underserved by NIH federal dollars.

To develop and sustain an interdisciplinary research workforce, NIH should modernize training mechanisms by creating targeted programs that integrate quantitative disciplines, such as AI, machine learning, physics, engineering, and data science, into biomedical research. Expanding NRSA training authorities to incorporate the skills needed to advance emerging technologies will help cultivate a new generation of interdisciplinary investigators capable of applying advanced computational and engineering tools to human health challenges. NIH should also expand support for advanced training courses and scientific conferences that promote cross-disciplinary collaboration.

Additionally, NIH should strengthen mechanisms that attract and retain international scientific talent, which is critical for sustaining U.S. leadership in the global biomedical research ecosystem. Uncertainty around visa policies and support for international trainees has already driven experts in AI, quantum science, and biotechnology to seek employment, education, and training abroad. Stable, robust support of research and training mechanisms for international talent is critical to reversing this trend.

Sustaining research capacity requires predictable investment in physical and data infrastructure. NIH must continue to recognize and support the actual costs of developing and sustaining the U.S. research enterprise. Indirect cost reimbursement is fundamental to maintaining research infrastructure and independent research institutes rely heavily on facilities and administrative (F&A) cost reimbursement to operate facilities and maintain safe laboratory environments. Reductions in indirect cost support would disproportionately harm smaller institutes and weaken the national research ecosystem. NIH must establish practical cost policies and secure adequate support for research costs, which are essential for research institutions to make the necessary investments to build and maintain enabling infrastructure that supports scientific discovery and innovation.

NIH should also focus on investment in data infrastructure, standardization, and sharing to manage the rapidly increasing scale of data generation and need for storage and advanced computation. NIH-funded data resources increasingly require long-term curation, access review, identity federation, cloud cost management, metadata standards, provenance, and security operations. These functions are essential to the public value of NIH investments, but they are not always funded or evaluated as first-class scientific outputs. Additional investment is needed to support advancing the research goals of the agency and the administration highlighted in the strategic framework.

Priority 3: Research Operations (500 words)

- Goal 1: Enhance Scientific Stewardship and Decision-Making

- Goal 2: Foster Transparency and Accountability to Improve Public Trust in Science

Independent research institutes are particularly sensitive to changes in policies that affect funding stability, administrative workload, and the predictability of grantmaking. Ensuring that NIH's research operations are efficient, transparent, and grounded in scientific merit is essential to sustaining the nation's biomedical research capacity. Ensuring that NIH's Strategic Plan strengthens research operations across all institution types is essential to maintaining U.S. scientific competitiveness and advancing NIH's strategic priorities.

Reducing administrative burden remains one of the most important steps NIH can take to improve scientific stewardship. Excessive reporting requirements, duplicative compliance processes, and inconsistent application instructions divert time away from research and disproportionately affect smaller institutions with limited administrative staff. Harmonizing application requirements across Institutes and Centers, simplifying progress reports, and streamlining compliance expectations would allow investigators, especially early-career scientists, to focus on discovery rather than paperwork.

Funding stability is equally critical. In the past year, AIRI member institutes have experienced significant delays in grant awards, including year-long gaps for applications with fundable scores. These delays and uncertainties have forced labs to lay off skilled staff, pause or stop experiments, and scale back planned research programs. Early-career investigators are particularly vulnerable, as gaps in support delay their development and jeopardize retention. We are increasingly seeing retention challenges, as individuals consider or accept competing offers in Europe and China, where funding stability and long-term research investment are perceived as more secure.

Funding disruptions and slow spending also erode public trust by delaying scientific progress and diminishing the perceived reliability of federal research investment. Ensuring timely award issuance, transparent scoring rankings, and stable year-to-year funding will help maintain confidence in NIH's ability to deliver on its mission. In addition, forward funding, while well-intentioned, has been implemented abruptly and without adequate transition planning, creating severe near-term funding shortfalls that many labs cannot weather. NIH should adopt a deliberate, phased approach to forward funding that avoids destabilizing the research ecosystem.

Targeted RFAs remain essential tools for advancing national research priorities while supporting investigator-initiated science. RFAs provide clarity, reduce uncertainty, and help institutions plan strategically. Continued use of targeted RFAs, especially in emerging fields and areas requiring coordinated effort, will strengthen NIH's ability to steward scientific progress.

To ensure strong scientific stewardship, NIH must also maintain a transparent, rigorous, and merit-based peer review system. Funding decisions must remain grounded in scientific quality, innovation, and public health impact, ensuring support of the most rigorous impactful science. Strengthening the consistency of peer review, improving reviewer training, and clearly communicating funding rationales will reinforce confidence in NIH's decision-making. This will strengthen public confidence that tax-payer resources are allocated based on objective and evidence-driven research criteria.