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October 27, 2023

The Honorable Bill Cassidy, M.D.
Ranking Member
Senate Committee on Health, Education, Labor, and Pensions
United States Senate

Dear Senator Cassidy,

The Association of Independent Research Institutes (AIRI) appreciates the opportunity to respond to the HELP Committee's Request for Information (RFI) on modernizing the National Institutes of Health (NIH) and thanks you for raising the important topics included in the RFI. As described in more detail below, AIRI believes firmly in preserving the NIH model for conducting biomedical research, an approach world-renowned for its ability to advance foundational, translational, and clinical biomedical research. As the world's largest funder of biomedical research, the NIH and the investments it has made have contributed directly and indirectly to nearly all of the most significant scientific advances that have transformed human health and well-being.

Role of Independent Research Institutions in the Biomedical Research Ecosystem

Founded in 1962, AIRI is a national association of more than 80 independent, not-for-profit biomedical and behavioral research institutes that play prominent roles in the United States biomedical and behavioral research enterprise (please see the attached membership list for a complete listing of AIRI members). Our mission is to enhance the ability of our members to advance knowledge and improve human health. AIRI member institutes are located across the country with many located in Institutional Development Award (IDeA) states, including the prestigious Louisiana Cancer Research Center. We are proud to have Nobel Laureates and members of the U.S. National Academy of Sciences among our scientists. Their groundbreaking contributions span various fields at the forefront of biomedical science, behavioral research, and clinical medicine. Among these fields are cancer research, precision medicine, HIV/AIDS, aging, genomics, neuroscience, drug and vaccine development, public health awareness, and cessation of smoking and adolescent substance abuse. AIRI scientists compete successfully for peer-reviewed research grants, receiving nearly 10 percent of the extramural funds awarded annually by the NIH.

Independent research institutes offer an important complement to university-based research. Many AIRI members are small and specialized, providing an environment that is conducive to creativity and innovation. Their research-only missions allow scientists to focus on discovery-based research while remaining structurally nimble and capable of adjusting research programs to emerging areas of inquiry and the evolving missions of federal research agencies. Our institutes attract the best and brightest of the next generation of biomedical and life sciences researchers which are mentored and trained by highly successful researchers.

Although the specialized focus and often small size of AIRI member institutes fosters flexibility and responsiveness, it also leaves them particularly vulnerable to increased administrative burdens that could accompany new federal requirements. While we are careful stewards of federal funding and take seriously our responsibility to safeguard federally funded research and development (R&D), we feel strongly that minimizing the administrative burden associated with the conduct of federally sponsored R&D is essential to maximizing this federal investment. Therefore, any new policies proposed for the extramural research program should be thoughtfully evaluated to ensure they do not have the unintended consequence of increasing the administrative burden for research organizations with limited resources, including research institutions in IDeA states, and independent research institutions nationwide.

Funding Model for Independent Research Institutions

The majority of AIRI member institutes receive the bulk of their funding from the NIH. Therefore, providing robust funding to the agency is crucial to advancing our institutes' missions. Unlike traditional universities or academic medical centers, many of our member institutes do not have alternative revenue streams such as tuition, fees, or payments from clinical services. As a result, AIRI member institutes are particularly vulnerable to reductions in NIH funding or changes to NIH cost policies.

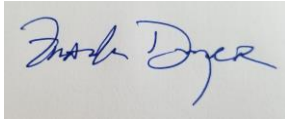
Facilities and administrative (F&A; sometimes referred to as indirect) costs support vital research infrastructure at our institutions. F&A costs are essential research costs. For AIRI members with few other sources of funding, these costs provide critical support for research infrastructure and operating expenses, such as the maintenance of state-of-the-art laboratories and high-tech facilities, data processing and storage, energy and utility expenses, security for dangerous chemicals and microbes, and the administration of a grant throughout its lifecycle. Unlike our partner academic institutions, AIRI member institutes do not have additional sources of non-federal revenue to compensate for reductions in NIH funding. Independent research institutions often have higher F&A costs relative to other grantees within the NIH ecosystem for this reason. The current distribution of F&A costs, determined through the competitive and globally respected NIH grant process, ensures that research can be conducted by the best researchers in the country. AIRI firmly opposes any policy change that would cap F&A costs on NIH grants, as such changes would significantly impede our institutions' ability to conduct life-saving research for the public health of our nation.

NIH extramural funding is also critical for supporting the salaries of our investigators. Competitive salaries for investigators are crucial for enabling us to attract and retain top talent for our prominent research programs. As NIH grants represent the most significant funding stream for many independent research institutions, it is essential that policies related to investigator salary support on grants are protected. Unlike traditional universities where investigators often have teaching and service responsibilities, or academic medical centers where investigators have clinical duties, our investigators are primarily dedicated to research. Therefore, AIRI is committed to ensuring that NIH funding can be used to support the salaries of extramural investigators.

Thank you for your continued leadership and commitment to biomedical research and public health. AIRI appreciates the opportunity to provide input on the modernization of the NIH, and we look forward

to working with you as this process moves forward. AIRI would welcome the opportunity to follow up with you and your staff for more extensive discussion on any of the topics raised in this letter. If you have any questions regarding our comments, please contact Nicole Parker in the AIRI Washington Office (nicole@lewis-burke.com; 202-289-7475).

Sincerely,

A handwritten signature in blue ink, appearing to read "Frank Dwyer", is shown within a rectangular frame.

Frank Dwyer
President
Association of Independent Research Institutes



Association of Independent Research Institutes

List of Members

Access to Advanced Health Institute (WA)
Allen Institute (WA)
Banner Research (AZ)
Benaroya Research Institute at Virginia Mason (WA)
Bigelow Laboratory for Ocean Sciences (ME)
Boyce Thompson Institute (NY)
Broad Institute of MIT and Harvard (MA)
Buck Institute for Research on Aging (CA)
Burke Neurological Institute (NY)
California Medical Innovations Institute (CA)
City of Hope (CA)
Cold Spring Harbor Laboratory (NY)
Coriell Institute for Medical Research (NJ)
Doheny Eye Institute (CA)
Donald Danforth Plant Science Center (MO)
Florida Institute for Human & Machine Cognition (FL)
Forsyth Institute (MA)
Fred Hutchinson Cancer Research Center (WA)
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Huntington Medical Research Institutes (CA)
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Laureate Institute for Brain Research (OK)
Lieber Institute for Brain Development (MD)
Lovelace Biomedical Research Institute (NM)
Louisiana Cancer Research Center (LA)
Ludwig Institute for Cancer Research (CA)
Lundquist Institute for Biomedical Innovation (CA)
Magee-Womens Research Institute (PA)
Marine Biological Laboratory (MA)
MDI Biological Laboratory (ME)
Moffitt Cancer Center (FL)
Monell Chemical Senses Center (PA)
Morgridge Institute for Research (WI)
New York Genome Center (NY)
Noble Research Institute, LLC (OK)
Northern California Institute for Research and Education (CA)
Oklahoma Medical Research Foundation (OK)
Oregon Research Institute (OR)
Pacific Health Research & Education Institute (HI)
Pacific Northwest Research Institute (WA)
Research Institute at Nationwide Children's Hospital (OH)
Rockefeller University (NY)
RTI International (NC)
Sage Bionetworks (WA)
Salk Institute for Biological Studies (CA)
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Sanford Burnham Prebys Medical Discovery Institute (CA)
Santa Fe Institute (NM)
Scintillon Institute (CA)
Scripps Research (CA)
SENS Foundation (CA)
Smith-Kettlewell Eye Research Institute (CA)
St. Jude Children's Research Hospital (TN)
Steadman Philippon Research Institute (CO)
Stowers Institute for Medical Research (MO)
Texas Biomedical Research Institute (TX)
Texas Heart Institute (TX)
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Veterans Medical Research Foundation (CA)
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Wistar Institute (PA)
Wood Hudson Cancer Research Lab, Inc. (KY)
Woods Hole Oceanographic Institution (MA)

List of Affiliates

Alles Institute for Medical Research (CA)
Bay Area Environmental Research Institute (CA)
Hepatitis B Foundation (PA)
Seattle Institute for Biomedical and Clinical Research (WA)
Simons Foundation, Inc. (NY)