



**AMERICAN  
PSYCHOLOGICAL  
ASSOCIATION**  
SERVICES, INC.

August 16, 2024

The Honorable Cathy McMorris Rodgers  
Chair  
House Energy and Commerce Committee  
2125 Rayburn House Office Building  
Washington, DC 20510

Via email: [NIHReform@mail.house.gov](mailto:NIHReform@mail.house.gov)

Dear Chair McMorris Rodgers:

The American Psychological Association Services (APA Services) appreciates the opportunity to partner with and respond to the House Energy and Commerce's request to National Institutes of Health (NIH) stakeholders regarding its proposed framework, [\*Reforming the National Institutes of Health: Framework for Discussion\*](#), itemizing current challenges it believes the agency is facing with accompanying recommendations for reform. APA Services is the companion organization of the American Psychological Association, which is the nation's largest scientific and professional nonprofit organization representing the discipline and profession of psychology, as well as over 157,000 members and affiliates who are clinicians, researchers, educators, consultants, and students in psychological science.

The NIH is the premier funder of biomedical and behavioral research with the mission: *seek fundamental knowledge about the nature and behavior of living systems and the application of that knowledge to enhance health, lengthen life, and reduce illness and disability*. The nation's investment in the NIH supports the economy via the awarding of more than 60,000 grants to 300,000 researchers at more than 2,500 institutions in every state. In fiscal year 2023, NIH funding generated an estimated \$92.89 billion in new economic activity. The agency is a catalyst for innovation and economic growth supporting more than 412,041 jobs.<sup>1</sup> In FY 2023, the agency supported more than 37,500 researchers and provided a wide range of training opportunities for researchers at various stages of their careers. Our investment in the NIH allows the agency to maintain its competitive advantage in the global marketplace and leads to longer, healthier lives. It is important that America continues to maintain its competitive advantage in medical research.

APA Services offers the following comments on the Committee's Framework.

### **Structural Reform**

APA Services appreciates the Committee's interest in eliminating the siloed nature of NIH-supported research and shares the Committee's goal to optimize the NIH organizational structure to align with current research opportunities. The Committee's desire for a "deliberative and engaging process" is a worthy goal. Accordingly, the association looks forward to a robust discussion by Congress, NIH, stakeholders, and organizational experts of what is needed to optimize the NIH's organizational structure

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<sup>1</sup> NIH's Role in Sustaining the U.S. Economy (2024 Update) <https://www.unitedformedicalresearch.org/>

to fulfill its mission. It is critical to strengthen Congress' and the public's trust in the NIH, along with the agency's transparency and accountability.

At the same time, APA Services strongly supports maintaining and continuing to unlock the value in today's dynamic biomedical research enterprise. Unfortunately, due to the lack of transparency of the criteria used, a key unanswered question for APA Services is whether the proposed consolidation of the NIH institutes and centers (ICs) will optimize NIH's ability to support whole person health which involves the consideration of multiple factors that promote either health or disease. *Or will the proposed restructuring inadvertently impede this ability?*

Whole person health involves multiple interconnected biological, behavioral, social, and environmental areas.<sup>2</sup> Without transparency of the criteria used for the proposed agency restructuring, it is difficult to answer this question. *What is the evidence that the proposed consolidation of the ICs will increase the NIH's operational efficiency to achieve and optimize its mission?*

Further, it is not clear how the proposed new structure will absorb existing collaborations and cross-cutting research including trans-NIH research led by the offices within Division of Program Coordination, Planning, and Strategic Initiatives (DPCPSI) in the Office of the Director.

#### Comprehensive Review

APA Services agrees with the Energy and Commerce Committee that the NIH is a large, complex organization and the Committee's recognition of the need for a comprehensive review of the NIH, including examination of its mission, objectives, programs, and performance. Such a review could also address the "politics" associated with medicine and the research and scientific issues of the complicated organization. The annual appropriations cycle is insufficient for the complexity of such a massive reorganization of the world's premier biomedical institution.

However, the association strongly asserts that this review should be the first step and should occur before Congress passes legislation whether through the appropriations process or a stand-alone reform bill restructuring the agency. The Committee has thoughtfully called for transparency. APA Services believes this transparency should extend to the proposed consolidation of the NIH 27 institutes and centers into 15 institutes in the Committee's framework for discussion for NIH reform. A comprehensive review is needed to assess the status of the current research supported by the agency, identify research gaps, highlight processes that should be integrated across the agency, and identify inefficiencies and areas where coordination is needed for integration. APA Services believe this review should examine the work of all the NIH institutes and centers.

Congress has an active role in setting research priorities, and over the years much of this priority setting has occurred through the annual appropriations process. Given the complexity of the NIH organization and the need for congressional understanding, APA Services believe that it is important that Congress via the House Energy and Commerce Committee (E&C Committee) and the Senate Health, Education, Labor and Pensions (HELP) hold oversight hearings. The hearings would serve to educate all of Congress and the public about the work of the NIH. These hearings should have clearly defined goals and objectives. The hearings would also give Congress the opportunity to hear directly from the NIH, its stakeholders,

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<sup>2</sup> Whole Person Health: What You Need to Know. <https://www.nccih.nih.gov/health/whole-person-health-what-you-need-to-know>

and other experts that can share fresh perspectives. Most important, the hearings would need to provide a clearly defined process for allowing the acceptance or rejection of recommendations of structural changes.

APA Services also believes that an independent review by National Academies of Sciences, Engineering, and Medicine (NASEM) or other congressionally directed body is needed to examine the state of the science and the NIH priority setting process in a changed environment. This review would examine the changes and policies implemented by the NIH since the 2003 NASEM report, *Enhancing the Vitality of the National Institutes of Health: Organizational Change to Meet New Challenges*.<sup>3</sup>

Many of the recommendations from the NASEM report were incorporated in the NIH Reform Act of 2006 (Public Law 109-482), including enhancing the authority of the NIH Director's Office around strategic planning, establishing the Division of Program Coordination, Planning, and Strategic Initiatives (DPCPSI) within the Office of the Director. The association believes it is important to examine the changes implemented to understand what is working, and what needs to be adjusted before making additional changes. It would be useful to understand if the Council of Councils, composed of representatives from the institutes and centers advisory councils and created to advise the NIH Director on the policies and activities of DPCPSI, has been successful. Most important, we are obligated to understand what adjustments can be made or if a wholesale structural reorganization of the agency is needed. Given the complexity of the NIH, the nation's investment, and the research it supports, APA Services believes that massive changes to the agency should be evidence based.

Other questions APA Services believes it would be useful to answer include:

- What has been the role of DPCPSI in implementing trans-NIH mechanisms since the NIH Reform Act?
- How has setting NIH research priorities process changed, if it has changed since the NIH Reform Act?
- What have been the outcomes of recent congressional directions to NIH?
- What were/are the unintended consequences, how were they resolved?
- Do congressional directives detract from research on other conditions or diseases?

#### Behavioral and Social Sciences Research Collaboration

Important to APA Services is the **NIH Office of Behavioral and Social Sciences Research (OBSSR)** created by Congress in 1993. We believe OBSSR's efforts can serve as a model for other trans-NIH research. OBSSR coordinates health-relevant behavioral and social sciences research and identifies challenges and opportunities to advance these sciences NIH-wide. Since its inception, OBSSR has led the coordination of trans-NIH behavioral and social science initiatives. For example, some of the initiatives are led by OBSSR while others are led by the ICs with OBSSR facilitating coordination, include the NIH Basic Behavioral and

<sup>3</sup> National Research Council and Institute of Medicine, *Enhancing the Vitality of the National Institutes of Health: Organizational Change to Meet New Challenges* (Washington: National Academies Press, 2003), <http://www.nap.edu/catalog/10779.html>. Congress requested this study from NAS in 2000. U.S. Congress, Senate Committee on Appropriations, Departments of Labor, Health and Human Services, and Education and Related Agencies Appropriation Bill, 2001, Report to Accompany S. 2553, 106th Cong., 2nd sess., May 21, 2000, S.Rept. 106-293, p. 179.

Social Science Opportunity Network, known as “OppNet,”<sup>4</sup> NIH-wide Pain and Opioid Initiatives,<sup>5</sup> COVID-19 Initiatives,<sup>6</sup> and Violence Research Initiatives.<sup>7</sup>

**OppNet.** The **NIH Basic Behavioral and Social Science Opportunity Network (OppNet)** prioritized activities and initiatives that focused on basic mechanisms of behavior and social processes relevant to multiple NIH institutes, centers, and offices and public health challenges that built on but did not replicate existing NIH investments.<sup>8</sup> OppNet was a 2004 – 2014 trans-NIH initiative that considered future directions for NIH basic behavioral and social sciences research in the context of transformative advances in the basic behavioral and social sciences, including neuroscience, behavioral assessment, data science, and statistical and computational modeling.

The 2021 review of the NIH basic behavioral and social sciences research portfolio (OBSSR), *Trans-NIH Research Opportunities in the Basic Behavioral and Social Sciences, National Institutes of Health Council of Councils Working Group report*, identified “promising and emerging areas of OBSSR relevant to the NIH mission” not adequately supported by the NIH. The lack of support for these areas suggested the need for a reprioritization of the bBSSR portfolio including research on event representation in perception, learning, and memory; greater focus on understudied regions of the brain, increased integration of how behavior and social are embodied both in the brain and the periphery, infectious disease-related basic behavioral and social processes, and the science of science, among others.<sup>9</sup>

Integration of Behavioral and Social Sciences Research. APA Services would like to bring the congressionally mandated **2022 Integration of the Behavioral and Social Sciences Research at the National Institutes of Health (NIH), NIH Council of Councils Working Group Report (Integration Report)** to the Committee’s attention as a potential resource to inform its efforts to address research silos. The Integration Report is an example of the type of review that could be helpful in eliminating research silos without a wholesale restructuring of the agency. The OBSSR Integration Report examined 24 ICs strategic plans for integration of “behavior” and “social” science and identified 12 ICs as having nominal behavioral and social science research (BSSR) integration. The Report also found BSSR funding within an IC is a “major indicator of the integration of those areas of science into the IC’s mission.” While APA Services agrees with the report that “although inclusion of BSSR in a strategic plan is not always sufficient to support integration of BSSR in the IC research agenda, the absence of BSSR in strategic plans sends a message that it may be of lesser importance.”<sup>10</sup>

The Integration report also recommends that the NIH director and each IC director evaluate and monitor the distribution of behavioral and social sciences research staff, identify strategies to address gaps in that staff and increase the diversity of BSSR expertise. Additionally, the report recommends that NIH engage

<sup>4</sup> OppNet <https://obssr.od.nih.gov/about/oppnet>

<sup>5</sup> NIH-wide Pain and Opioid Initiatives <https://obssr.od.nih.gov/about/nih-wide-pain-and-opioid-initiatives>

<sup>6</sup> COVID-19 Initiatives. <https://obssr.od.nih.gov/about/covid-19-initiatives>

<sup>7</sup> Violence Research Initiatives. <https://obssr.od.nih.gov/about/violence-research-initiatives>

<sup>8</sup> Trans-NIH Research Opportunities in the Basic Behavioral and Social Sciences National Institutes of Health Council of Councils Working Group Report May 21, 2021

<sup>9</sup> Trans-NIH Research Opportunities in the Basic Behavioral and Social Sciences National Institutes of Health Council of Councils Working Group Report May 21, 2021

<sup>10</sup> Integration of Behavioral and Social Sciences Research at the National Institutes of Health (NIH) report of the NIH Council of Councils Working Group Report, [https://obssr.od.nih.gov/sites/obssr/files/inline-files/BSSR\\_IntegrationWorkingGroupReport\\_508.pdf](https://obssr.od.nih.gov/sites/obssr/files/inline-files/BSSR_IntegrationWorkingGroupReport_508.pdf)

BSSR expertise throughout the development and implementation of new research policies and practices. To support BSSR integration across the NIH, the report identified crosscutting improvements, including consistently involving BSSR to “enhance the effective, efficient, equitable, and ethical conduct of science.”<sup>11</sup>

Blueprint for the Use of Social and Behavioral Science to Advance Evidenced-Based Policymaking. A second example, APA Services would like to highlight is the ***Blueprint for the Use of Social and Behavioral Science to Advance Evidenced-Based Policymaking*** by the Subcommittee on Social and Behavioral Sciences of the Committee on Science of the National Science and Technology Council within the White House. The report is designed “to provide a resource to assist federal decision-makers in leveraging social and behavioral science to improve policy and program design and delivery,” if any. The report highlights the essential role the social and behavioral sciences play in fulfilling the promise of evidence-based policies that deliver important outcomes to the American public by informing “the conceptualization, development, implementation, dissemination, and evaluation of interventions, programs, and policies that address...national priorities.”<sup>12</sup>

The Blueprint is a whole-of-government effort that aims to provide a resource to assist federal decision makers in leveraging social and behavioral science to improve policy and program design and delivery. Using the insights and approaches of the social and behavioral sciences, it can inform decision-making. These sciences “offer unique tools for describing, understanding, and addressing societal challenges and assessing and evaluating initiatives, programs, and policies.”<sup>13</sup>

#### NIH Core Consolidation

APA Services would also like to bring the work of the **NIH Office of Research Infrastructure Programs (ORIP)** to the Committee’s attention as it considers IC consolidation. The office supports infrastructure and resources for innovation. ORIP is located within DPCPSI and works to identify scientific research gaps and emerging opportunities, including emerging public health challenges. A trans-NIH office, ORIP also collaborates with ICs as well as other federal and nongovernmental organizations.<sup>14</sup> ORIP played a significant role in providing infrastructure and supporting research during the COVID-19 pandemic. The office provided researchers with access to “shared instruments for NIH-funded investigators that are research-agnostic.”<sup>15</sup>

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<sup>11</sup> Integration of Behavioral and Social Sciences Research at the National Institutes of Health (NIH) report of the NIH Council of Councils Working Group Report, [https://obssr.od.nih.gov/sites/obssr/files/inline-files/BSSR\\_IntegrationWorkingGroupReport\\_508.pdf](https://obssr.od.nih.gov/sites/obssr/files/inline-files/BSSR_IntegrationWorkingGroupReport_508.pdf)

<sup>12</sup> Blueprint for the Use of Social and Behavioral Science to Advance Evidence-based Policymaking <https://www.whitehouse.gov/wp-content/uploads/2024/05/Blueprint-for-the-Use-of-Social-and-Behavioral-Science-to-Advance-Evidence-Based-Policymaking.pdf>

<sup>13</sup> Blueprint for the Use of Social and Behavioral Science to Advance Evidence-based Policymaking <https://www.whitehouse.gov/wp-content/uploads/2024/05/Blueprint-for-the-Use-of-Social-and-Behavioral-Science-to-Advance-Evidence-Based-Policymaking.pdf>

<sup>14</sup> ORIP Director’s Message. <https://orip.nih.gov/about-orip/orip-directors-message>

<sup>15</sup> ORIP Director’s Message. <https://orip.nih.gov/about-orip/orip-directors-message>

### Additional Questions for Consideration

Finally, APA believes that it is important to understand the answers to questions not addressed in the framework, among others, before making such significant structural and policy changes to the NIH. We need to know:

**Are we doing the right science? What are the promising and emerging areas of research that are priorities for NIH support? What emerging areas of research are not adequately supported by the NIH? What is missing? Do these emerging areas require a trans-NIH approach, or can individual IC effort address them? If the NIH was established today, what principles and supports should the agency be organized around? Where is there duplication of efforts and gaps in the research? What is the role of the current organizational structure? What efforts, if any, are underway to identify and address how the current structure inadvertently adversely affects NIH's ability to respond to new scientific and public health challenges? What processes are needed to improve coordination and integration of programs across the NIH? Are there models where it has been successful? If not, what has impeded these efforts and what is needed to overcome the roadblocks? How will we know if the proposed changes are successful? Will there be a built-in review?**

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### Unintended Consequences

At the same time, with an agency the size and complexity of NIH, it is important to guard against unintended consequences of a structural reorganization for research. For instance, in their research, psychologists, Staats et al., found that in the creation of larger teams, which would happen in the merger of institutes, the advantages associated with adding workers are often accompanied by various disadvantages.<sup>16</sup> Their research provide evidence for a phenomenon they call *team scaling fallacy* which finds “that project labor is underestimated as team size increases.”

Science is a risky endeavor; scientists study for years to reach a point where they can support themselves as scientists. U.S. investment in them, and their own investment, is huge. Therefore, it is important to consider how any reorganization will affect the scientific workforce. Psychological research shows that “large-scale organizational changes are also risky endeavors where approximately three quarters of all mergers and acquisitions “never pay off.”<sup>17</sup> Large-scale organizational changes can be defined as “those that dramatically alter the structure and/or culture of an organization.” The research further shows that these long-term change initiatives take time to unfold and can be a source of uncertainty and strain. Accordingly, the inherently uncertain and stressful nature of large-scale organizational change results in a loss of change momentum because of employee beliefs about the reorganization change over time. It is a crucial factor to consider.

### Case Study: The Impact of Name Reform

An example of one of the many types of issues that would benefit from a comprehensive review by an expert body such as the NASEM is the need for NIH to no longer include “abuse” in the title of institutes. Science demonstrates that when we label people as “addicts” or “alcoholics,” they are diminished to a

<sup>16</sup> Staats, B. R., Milkman, K. L., & Fox, C. R. (2012). The team scaling fallacy: Underestimating the declining efficiency of larger teams. *Organizational Behavior and Human Decision Processes*, 118(2), 132-142. <https://doi.org/10.1016/j.obhdp.2012.03.002>

<sup>17</sup> Belschak, F. D., Jacobs, G., Giessner, S. R., Horton, K. E., & Bayerl, P. S. (2020). When the going gets tough: Employee reactions to large-scale organizational change and the role of employee Machiavellianism. *Journal of Organizational Behavior*, 41(9), 830-850. <https://doi.org/10.1002/job.2478>

singular negative behavior. Research has indicated that clinicians' application of such labels can be punitive, stigmatizing and discourage treatment engagement for clients.<sup>18</sup>

## Funding Reform

### Indirect costs

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The framework recommends a reexamination of indirect costs also known as Facilities and Administrative (F&A). APA Services recognizes the need and role that indirect costs play in the government's funding of research and development. The association is concerned that the proposed changes could negatively affect research support. The indirect cost reimbursement policy is critical to the continued success of the U.S. research enterprise. According to the Council on Governmental Relations (COGR), an association of nearly 200 leading universities and research institutions, indirect costs, "are the real and tangible infrastructure costs that provide the foundation for America's world-class investigators and researchers to do cutting-edge research."<sup>19</sup> These costs are essential to the successful execution of research projects and cover the expenses that are not directly attributable to a specific project but are necessary for the general operation of an institution and the conduct of its research activities, including infrastructure and operations, administrative support, technology and equipment, research sustainability and intellectual property management.

While indirect costs may not be visible in the outcomes of research, they are a critical component of the research ecosystem. They ensure that institutions have the necessary infrastructure, support services, and sustainability to conduct high-quality research. Without indirect costs, the direct costs of research would be much higher, as researchers would need to individually cover these necessary expenses. APA Services believes it is crucial to recognize and account for these costs in research budgeting and funding decisions. A cut to the indirect costs could result in unintended consequences for America's competitive edge in science and innovation. It is important that Congress work with universities and research institutions to produce a workable solution to optimize research and maintain its commitment to bear the fair share in the costs supporting research conducted on its behalf at universities and research institutions.

## Policy Reform

### Grant Reform

APA Services supports the NIH peer review process and the agency's ongoing efforts to optimize the process to support the best science. While there have been concerns expressed about peer review, the association acknowledges that the agency is instituting changes to mitigate those concerns, including potential bias, reviewer burden, and the complexity of the process. NIH's commitment to continuously improve the peer review process, ensuring it that it is fair, equitable, and free from bias should be commended.

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<sup>18</sup> Kulesza M, Larimer ME, Rao D. Substance Use Related Stigma: What we Know and the Way Forward. J Addict Behav Ther Rehabil. 2013 May 27;2(2):782. doi: 10.4172/2324-9005.1000106. PMID: 25401117; PMCID: PMC4228689.

<sup>19</sup> Excellence in Research: The Funding Model, F&A Reimbursement, and Why the System Works, [https://www.cogr.edu/sites/default/files/ExcellenceInResearch4\\_12\\_19\\_0.pdf](https://www.cogr.edu/sites/default/files/ExcellenceInResearch4_12_19_0.pdf)

Concerns about the process have led to recent improvements in the NIH peer review process to ensure fairness, reduce the complexity, and mitigate potential bias. The agency has announced improvements to the peer review process, effective January 25, 2025, designed to clarify, simplify, and promote greater fairness in the application and review processes. The changes include revisions to the NIH Fellowship application and review process.

APA Services supports NIH's efforts to support a greater diversity of awardees, geographical, institutional, and demographic. The association has commended the agency for its continued efforts to foster inclusive excellence in the research workforce via its agency-wide strategic plan for diversity, equity, inclusion, and accessibility (DEIA) and the strategic plan of the Chief Officer for Scientific Workforce Diversity. APA Services agrees with NIH that an intentional systemic approach to organizational and workplace DEIA is required. The agency's DEIA efforts will support a scientific workforce better reflecting the diverse backgrounds and experiences of the U.S. population.

## Conclusion

Thank you again for the opportunity to join this critical conversation and give feedback on the proposed discussion framework. If this association can serve as a resource to the Committee, please do not hesitate to contact APA's Chief Advocacy Officer, Katherine B. McGuire, MSc ([kmcguire@apa.org](mailto:kmcguire@apa.org)) or Senior Director, Congressional & Federal Relations, Angela Sharpe, MG, ([asharpe@apa.org](mailto:asharpe@apa.org)), at any time.

Sincerely,



Katherine B. McGuire, MSc  
Chief Advocacy Officer

cc:     The Honorable Frank Pallone, Jr.  
          The Honorable Bernie Sanders  
          The Honorable Bill Cassidy  
          The Honorable Tammy Baldwin  
          The Honorable Shelly Moore Capito  
          The Honorable Robert Aderholt  
          The Honorable Rosa DeLauro