

The Honorable Ron Johnson
Chairman
United States Senate Committee on
Homeland Security and Government Affairs
328 Hart Senate Office Building
Washington, DC 20510

The Honorable Gary Peters
Ranking Member
United States Senate Committee on
Homeland Security and Government Affairs
724 Hart Senate Office Building
Washington, DC 20510

Dear Chairman Johnson and Ranking Member Peters,

I am contacting you today on behalf of the Endocrine Society to share our concerns regarding H.R. 1608, the Federal Advisory Committee Act Amendments of 2019. While we appreciate the intent of the bill to improve compliance with the Federal Advisory Committee Act (FACA), minimize conflicts of interest, and increase transparency of advisory committees, we are concerned about the potential impact of the bill on the peer review system at the National Institutes of Health (NIH). We urge the Committee to exclude NIH peer review groups from additional administrative requirements in the final bill.

Founded in 1916, the Endocrine Society is the world's oldest, largest, and most active organization dedicated to the understanding of hormone systems and the clinical care of patients with endocrine diseases and disorders. Our membership of over 18,000 includes biomedical researchers, many of whom participate in grant review panels at the NIH.

We believe that the requirements in H.R. 1608 would reduce the pool of researchers willing to review grants, causing extreme delays in the grant review process and reducing the diversity of expertise available to review projects in cross-cutting disciplines such as endocrine science. Service on grant review panels is already a time-consuming and burdensome task that scientists participate in as a service to the biomedical research community. Mandating that NIH peer reviewers be subject to the same administrative requirements as other special government employees (SGEs) would introduce additional burdens on researchers who already struggle with onerous administrative requirements e.g., in grant preparation and submission.

We strongly support the Committee's efforts to improve transparency around FACA committees that provide advice and guidance to federal agencies. We are very concerned about efforts by regulated entities to provide guidance to agencies where the ability to impartially collect and evaluate data is of paramount importance in regulatory decision-making. However, we note that NIH grant reviews are already subject to a second level of peer review by institute Advisory Councils, who are subject to the more comprehensive SGE requirements. This system of peer review in two levels accomplishes the dual goal of reducing administrative burden for the vast majority of participating reviewers while limiting conflicts of interest.



In summary, we urge the Committee to exclude NIH from provisions in the bill that would introduce new and burdensome requirements on NIH reviewers who participate in peer review panels. We assert that the existing review system enables the experts best positioned to evaluate complicated grant proposals to participate while ensuring an appropriate level of transparency and oversight.

Thank you for considering our comments, if we can be of any further assistance, please do not hesitate to contact Joseph Laakso, Director of Science Policy at jlaakso@endocrine.org.

Sincerely,

E. Dale Abel MD PhD
President
Endocrine Society