



October 12, 2009

**National Organization on
Fetal Alcohol Syndrome**

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Dr. William Roper
Chairman
Substance Use, Abuse, and Addiction Workgroup
Scientific Management Review Board, OD, NIH
Building 1, Room 103
9000 Rockville Pike
Bethesda, MD 20892

Dear Dr. Roper:

The National Organization on Fetal Alcohol Syndrome (NOFAS) is troubled by the growing reports that representatives of NIDA have publicly portrayed the possible merger of NIAAA and NIDA as a “done deal” that enjoys the avid support of NIH leadership. I understand, for example, that NIDA officials have been commenting over the past year at symposia and professional association meetings that the merger is inevitable and that such comments may have played a role in shaping organizational positions on the merger.

Indeed, Dr. Darrell Regier, Executive Director of the American Psychiatric Institute for Research and Education, and Director, Division of Research, American Psychiatric Association (APA), stated the following in a note to members who dissented strongly with the APA endorsement, *“with regard to the proposed merger, the Council’s carefully considered the fact that both the IOM and the NIH leadership have strongly supported this merger with the likelihood being high that it will be approved”*. Similarly, I note that Dr. Alan Leshner, who had only recently stepped down as director of NIDA, was a key participant in the development of the IOM recommendation.

These reports are troublesome on several levels. First, they undermine the integrity of the comprehensive process which the Scientific Management Review Board (SMRB) has put in place to methodically assess the need for and merits of a possible merger of the institutes. If the results of the process are pre-ordained, the substantial time and resources dedicated to this effort by SMRB, the Substance Use, Abuse and Addiction Workgroup (SUAA) and, of course, the numerous stakeholders, are wasted.

Second, such comments chill open and objective debate about the issue. If interested parties are led to believe that the merger is a fait accompli, they may color their commentary so as not to offend NIH leadership or the leaders of the surviving institute. Worse yet, such comments may dissuade stakeholders from participating in the discourse at all. Finally, such remarks subvert Congressional intent, as expressed in the NIH Reform Act of 2006, that the SMRB rigorously review and objectively assess the extent to which NIH should exercise its organizational authorities. If the merger is inevitable, the SMRB efforts are superfluous.

NOFAS urges you in the strongest possible terms to take steps to ensure that the air of inevitability which some suggest has settled over these deliberations is quickly dispelled.

NOFAS appreciates SUAA's exhaustive work on this critical issue and looks forward to continued active participation in the process.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Donaldson". The signature is fluid and cursive, with the first name "Tom" being particularly prominent.

Tom Donaldson
President