

AVMA



American Veterinary Medical Association

1931 N. Meacham Rd.
Suite 100
Schaumburg, IL
60173-4360
phone 847.925.8070
800.248.2862
fax 847.925.1329
www.avma.org

December 6, 2010

Scientific Management Review Board
ATTN: Ms. LYRIC JORGENSEN
Office of Science Policy
Office of the Director, National Institutes of Health
6705 Rockledge Dr, Suite 750
Bethesda, MD 20892

smrb@mail.nih.gov

VIA E-MAIL ONLY

Dear Chairman Augustine and Members of the NIH Scientific Management Review Board:

I am writing on behalf of the American Veterinary Medical Association (AVMA), established in 1863 and the largest veterinary medical association in the world. As a not-for-profit association established to advance the science and art of veterinary medicine, the AVMA is the recognized national voice for the veterinary profession. The Association's more than 81,000 members comprise approximately 83% of US veterinarians, all of whom are involved in myriad areas of the profession, including biomedical and comparative medical research; private and corporate practice; and academic, industrial, governmental, military, and public health services.

The AVMA thanks the Scientific Management Review Board (SMRB) for this opportunity to provide comments on the recommendations from the Translational Medicine and Therapeutics (TMAT) working group, which will be considered for potential decision by the SMRB at its December 7, 2010 meeting. It is our understanding that these recommendations call for a strengthening of existing federal translational and comparative medicine programs into a new institute/center (IC) with strong functional ties to the NIH Clinical Center. Key components of the proposed new IC are the recently authorized Cures Acceleration Network (CAN) and the established Clinical and Translational Science Awards (CTSA) program and consortium, which is currently an integral component of the NIH's National Center for Research Resources (NCRR).

The AVMA wishes to emphasize that the NCRR comprises not only the CTSA consortium, but also multiple other important programs, including those administered through its four divisions—Comparative Medicine, Clinical Research Resources, Biomedical Technology, and Research Infrastructure. It is of concern to the AVMA that the TMAT recommendations, which were summarized in a presentation given on November 10, 2010, made no reference to these other important NIH/NCRR programs. It is the AVMA's belief that the strength of the NCRR lies in the synergy within the programs administered through each of its divisions. Taken as a unit, each division contributes to the foundation of the entire NIH research enterprise. Thus, regardless of the final organizational structure selected to strengthen translational and therapeutic development research, the AVMA believes the SMRB should maintain the integrity of each of the NCRR's divisions and programs to continue the NCRR's critical role within the NIH.

Of particular importance to the AVMA and its more than 81,000 members are the programs administered through the NCRR's Division of Comparative Medicine (DCM). The AVMA defines comparative medicine as a discipline in which the similarities and differences in biology among animals enhance the understanding of mechanisms of human and animal disease alike. In this way, biomedical research, clinical studies, and ultimately, therapy directed at experimentally induced and spontaneously occurring diseases in animals form the basis for animal models of human and animal disease. In other words, comparative medicine embodies translational

medicine. Further, because veterinary medical education is firmly based on a comparative and one-medicine approach, veterinary scientists are uniquely positioned to play an essential role in translational research. The study of spontaneously occurring disease in domestic animals and wildlife and disease pathogenesis in laboratory animals play an essential role in biomedical and therapeutic development research. Veterinary scientists have a critical role not only in drug discovery, but also in the safety assessment of drugs and devices. Development of new drugs and medical therapies will not be effective without the help of animal research. In addition, we now recognize that over two-thirds of new emerging infectious diseases of humans arise in animals. In summary, veterinary scientists understand the health and welfare needs of all species of laboratory animals and are able to ensure those needs are met; the usefulness and limitations of animal models; and the regulatory requirements to bring a new human drug to market—all key components of translational medicine and therapeutic development research. As such, the AVMA strongly supports and affirms the recognition by the NIH of the role of veterinarians as scientists, educators, trainers, and collaborating partners in scientific research that takes a comparative, one-medicine approach to improvements in human and public health, as stated in the NCRR 2009-2013 strategic plan (www.ncrr.nih.gov/strategic_plan/).

Current DCM programs provide individual researchers and research institutes both within and outside the NIH with laboratory animal resources ranging from aquatic and rodent species to nonhuman primates; invertebrate and vertebrate comparative models for translating basic biomedical research results into clinically useful therapeutics; and career development opportunities for predoctoral veterinary students and individuals with DVM or PhD degrees to ensure a continued pipeline of scientists experienced in comparative medicine. To the AVMA, each of these DCM programs is as essential a component of a strong translational medicine and therapeutic development research institute as are the CAN and CTSA programs. The AVMA urges the SMRB to recognize the ongoing and urgent need for career development of researchers focused on comparative medicine, as has been previously recommended by two National Research Council committees (*Critical Needs for Research in Veterinary Science*, published in 2005; and *National Need and Priorities for Veterinarians in Biomedical Research*, published in 2004). The successful individual and institutional training grants and independent scientist award programs administered through the NCRR are vital to ensure the continuation and growth of the current pipeline leading to future comparative and translational medical research scientists.

In summary, then, the AVMA respectfully recommends that the SMRB:

1. maintain the integrity of each of the NCRR's divisions regardless of the final action taken on the recommendations of the TMAT to ensure that the current divisional programs retain synergistic strength.
2. maintain the Division of Comparative Medicine as an intact unit within the new translational medicine IC proposed by the TMAT should that structure be approved or within an existing but broad-based IC.

We thank you for the opportunity to provide input to the SMRB. Should you have questions, please feel free to contact Dr. Elizabeth Sabin (esabin@avma.org; ext 6675) in the AVMA's Education and Research Division.

Yours sincerely,

A

FOR: W. Ron DeHaven, DVM, MBA
Executive Vice President, CEO