

National Advisory Research Resources Council

Letter to the NIH Scientific Management Review Board

22 February 2011

Mr. Norman Augustine
Chair, Scientific Management Review Board, OD, NIH
Building 1, Room 103
9000 Rockville Pike
Bethesda, MD 20892

RE: NIH Decision to Eliminate NCRR and to Distribute Programs to Other Institutes and Centers.

Dear Mr. Augustine,

As members of the National Advisory Research Resources Council (NARRC), we are writing once again to express our deep concern about the process by which the Office of the NIH Director has decided to eliminate the National Center for Research Resources (NCRR). We understand and support efforts to strengthen the ability of the NIH to meet its most important goal of improving human health through science but believe that the elimination of the NCRR is not a necessary step toward that goal.

We are specifically troubled that the Scientific Management Review Board (SMRB) did not fully exercise its duties specified in the NIH Reform Act of 2006 *before* the decision to eliminate NCRR was recommended to the Secretary of HHS and then to Congress. The SMRB is charged with making recommendations to the NIH and others on the use of organizational authorities reaffirmed in the NIH Reform Act of 2006 (PL 109-482). It appears to us that the SMRB has not followed its own adopted framework as set forth in Deliberating Organizational Change & Effectiveness (DOCE) for considering and, if warranted, implementing and evaluating organizational change. Decisions to establish or abolish institutes must be preceded by a systematic, transparent process guided by sound criteria and principles and based on the analysis and consideration of multiple sources of information and opinion.

The official charge to the SMRB's Translational Medicine and Therapeutics (TMAT) Working Group did not include any requirement by the SMRB to evaluate the impact creation of the National Center for Advancing Translational Science (NCATS) would have on NCRR and/or the NIH, in general. On December 7, 2010, the SMRB specifically recommended the creation of the NCATS without mention of NCRR's fate yet the formal recommendation to Congress regarding the creation of NCATS also included a recommendation to eliminate NCRR.

The Reform Act expressly provides that with any significant consideration of a proposal for organizational changes, the SMRB must (I) analyze the budgetary and operational consequences of the proposed changes; (II) take into account historical funding and support for research activities at national research institutes and centers that have been established recently relative to national research institutes and centers that have been in existence for more than two decades; (III) estimate the level of resources needed to implement the proposed changes; (IV) assuming the proposed changes will be made, make a recommendation for the allocation of the resources of NIH among the national research institutes and national centers; and (V) analyze the consequences for the progress of research in the areas affected by the proposed changes.

The process undertaken over these past months leading to the decision to eliminate NCRR was rushed and excluded members of the affected scientific community, the NCRR leadership, and the NCRR advisory council from any input into the process. Congress and the public expect and deserve, among other things, transparency, stakeholder input, meaningful deliberation and consideration, and

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importantly, analysis of impact and consequences *before the fact*, not after decisions have been made. This is essential to ensure continued public trust.

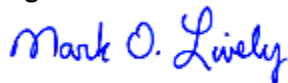
The mission of the NCRR is unique at the NIH, providing flexibility and independence not easily available in categorical ICs. Its programs contribute substantially to ICs that provide extramural funding. The outcry from the research community following announcement of the intention to eliminate NCRR and to reassign its programs to other ICs should be considered in a meaningful way. More than 1100 comments, largely negative, have been registered on the NIH feedback site. Efforts to inform the community *after the fact* by conducting telephone conference calls do not adequately address the concerns raised by the community. The temporary “straw model” pieced together over the Christmas holidays shows the incomplete nature of the planning for reorganization of NCRR programs. Specifically, the creation of the “Interim Infrastructure Unit” as a temporary administrative unit for many of the non-CTSA NCRR programs underscores the difficulty associated with identifying logical new homes for those NCRR programs in other NIH institutes and centers.

We strongly urge the SMRB and Office of the Director to delay any further decisions based on the recommendation to eliminate NCRR and to delay any reassignment of NCRR programs. Proposed changes to existing NCRR programs must involve further open discussion with the scientific community, as well as the other NIH ICs. We see no scientific justification for rushing these decisions in order to complete the reorganization prior to October 1, 2011.

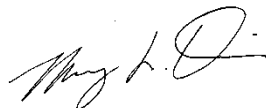
Finally, as we requested in our letter of November 30, 2010, strong consideration should be given to continuation of the NCRR as a free standing center.

Respectfully submitted, Members of the NARRC,

Signatories



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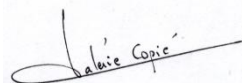
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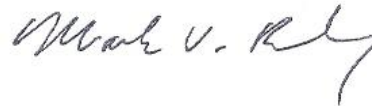
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