



February 15, 2011

Drs. Lawrence Tabak and Alan Guttmacher
Co-Chairs, NCRR Task Force
Office of the Director
National Institutes of Health
6705 Rockledge Drive, Suite 750
Bethesda, MD 20892
smrb@mail.nih.gov

Dear Co-Chairs Tabak and Guttmacher, and Members of the NIH NCRR Task Force:

On behalf of Tufts University Cummings School of Veterinary Medicine, we are writing this letter to provide comments and recommendations on the National Center for Research Resources (NCRR) Task Force Straw Model showing the proposed new National Institutes of Health (NIH) homes for current NCRR programs.

We recognize the importance of the NIH's initiative to create the National Center for Advancing Translational Sciences (NCATS), and welcome the potential benefits to our nation's health of an invigorated focus on translational medicine and therapeutics. Our faculty members are proud of their significant contributions toward improving human health through transdisciplinary involvement and collaboration in translational research and comparative medicine. The support offered by NCRR programs (T35 and T32 training grants) and resources (renovation of laboratory animal facilities) to our institution have made possible their important contributions to our nation's health, and we greatly appreciate the opportunity to provide comment and recommendations to further advance the successes of critical NCRR programs.

In review of the Straw Model, we have the following comments:

1. To successfully fulfill its mission of accelerating the development and delivery of new, more effective therapeutics, the NCATS will rely on a diversity of appropriately trained laboratory scientists and clinical researchers capitalizing on the development of tools and technologies and making discoveries at molecular and cellular levels that can be tested and proven in animal based studies.
2. Although a logical and rational argument can be made for including NCRR's Clinical and Translational Science Award (CTSA) program, which is designed to develop teams of investigators from various fields of research who can transform scientific discoveries made in the laboratory into treatments and strategies for patients in the clinic, into the new NCATS, the same cannot be said for excluding and dismembering other components of NCRR, such as animal resources, training programs, and high-end instrumentation and technologies which are so critical to NCATS mission.
3. Further, as indicated in the NCRR Task Force Straw Model, proposing to subdivide these other NCRR components disrupts the extant scientific synergies that have been demonstrated meritorious to date, and forfeits the strategic relationships that have been built between programs over the last 20 years. For example, splitting the animal

resources into different administrative structures erects a bureaucratic obstacle that needlessly hinders the flow of basic scientific discoveries made in induced genetic mutations in mice to clinically applicable mechanisms-of-action studied and tested in non-human primates.

4. Although it is expected that following this restructuring, NCRR will no longer exist as a center, a rational consideration would be to maintain a large component of NCRR programs together after reassignment of the CTSA program within the new NCATS. Those charged with making these decisions should be mindful that NCRR's unique, cross-cutting programs are and have been successful through careful planning, thoughtful leadership, and effective management by its administrative and scientific staff, program officers, and officials who understand these programs and are most qualified to ensure continued success of their respective programs and initiatives.

We therefore strongly recommend that the NCRR's Division of Comparative Medicine (both programs and staff) be retained as a functional entity after reassignment of the CTSA program. The optimal location of the unit within the NIH (e.g., NCATS, National Institute of General Medical Sciences, or Office of the Director), should be carefully deliberated with input from NCRR staff and stakeholders.

Please do not hesitate to contact us if we may provide additional information regarding our recommendations on the Straw Model.

Sincerely,



Deborah T. Kochevar, DVM, PhD, DACVCP
Dean and Henry and Lois Foster Professor
Cummings School of Veterinary Medicine at Tufts University
200 Westboro Road
North Grafton, MA 01536
TEL: 508.839.5302 EXT. 84700
EMAIL: Deborah.Kochevar@tufts.edu



M. Sawkat Anwer, PhD, DMVH
Distinguished Professor & Associate Dean for Research
Tufts University Cummings School of Veterinary Medicine
200 Westboro Road
North Grafton, MA 01536
TEL: 508-839-8788
FAX: 508-839-8787
EMAIL: Sawkat.anwer@tufts.edu