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**To:** [SMRB \(NIH\OD\)](#)  
**Cc:** [Ted Mashima](#); [Judy R Wood](#)  
**Subject:** SMRB Public Comment  
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February 18, 2011

Mr. Norman Augustine

Chair, Scientific Management Review Board

Office of the Director

National Institutes of Health

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

I am writing on behalf of Cornell University's College of Veterinary Medicine to provide comments and recommendations on the National Center for Research Resources (NCRR) Task Force Straw Model.

We recognize the importance of the NIH's initiative to create the National Center for Advancing Translational Sciences (NCATS) and appreciate the potential benefits to our nation's health of an invigorated focus on translational medicine and therapeutics. Faculty in our College continue to be fully committed to making scientific contributions toward improving human health by participating in collaborative translational research and sharing their expertise in comparative medicine. The financial support and organizational efforts provided by NCRR programs and resources to our institution have advanced science, fostered the career development of junior scientists, and provided an infrastructure for comparative medicine biomedical research. The opportunity to provide comment and recommendations to further advance the successes of critical NCRR programs is welcome.

It is unfortunate in our view that consideration of the disposition of the elements of NCRR other than the CTSA's is occurring on a *post-hoc* basis. The cross-cutting programs encompassed by NCRR 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. Consequently, we believe equally careful consideration should be given to

the reorganization of these programs and that every effort should be made to maintain their cohesiveness in future iterations of the Center.

With respect to specific elements of the Straw Model:

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. The training of a large segment of these individuals has been a focal point of NCRN programs in the past, in particular the diverse array of training grants.
2. Although a logical and rational argument can be made for including NCRN's Clinical and Translational Science Award (CTSA) program, the same cannot be said for excluding and dismembering other components of NCRN, such as animal resources, training programs, and high-end instrumentation and technologies that are so critical to NCATS mission.
3. Further, as indicated in the NCRN Task Force Straw Model, proposing to subdivide these other NCRN components disrupts the extant scientific synergies that have been effective 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, NCRN will no longer exist as a center, a rational consideration would be to maintain a large component of NCRN programs together after reassignment of the CTSA program within the new NCATS.

For the reasons given above, it is strongly recommended that the NCRN's Division of Comparative Medicine (both programs and staff) be retained as a functional entity after reassignment of the CTSA program.

Please do not hesitate to contact me at 607-253-3755 or by email at [rfg2@cornell.edu](mailto:rfg2@cornell.edu) if you would like additional information or input.

Sincerely,

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