



Society for Research in Child Development  
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Chair Cathy McMorris Rodgers (R-WA)  
U.S. House Energy and Commerce Committee  
2125 Rayburn House Office Building,  
Washington, D.C. 20515

## **RE: Reforming the National Institutes of Health**

Dear Chair Rodgers,

The Society for Research on Child Development (SRCD) appreciates the opportunity to submit comments on the proposed changes to the National Institutes of Health (NIH). It is in the best interest of the American people that our largest federal research agency is properly supported to fulfil its critical mission and objectives and continue to lead the world in research and scientific innovation.

SRCD is a nonpartisan, multidisciplinary professional membership association with thousands of developmental scientists. Our members come from a broad set of backgrounds, including psychology, biology, sociology, education, anthropology, economics, public health and more. Their work seeks to improve the lives of children and families. Our members ask questions about how individual differences and complex systems can impact human behavior, and we look to apply our science in homes, childcare settings, classrooms, schools, pediatric settings, public policy and more.

Our discipline studies a wide range of topics supported by the NIH, including pre-natal health, the impact of nutritional programs on children, childcare outcomes, youth mental health, bilingual learning, and more. Many of our members' work relies on the opportunities that the NIH provides. We applaud the Chairwomen and the Committee staff for reaching out to stakeholders to get feedback on how the NIH can continue to support our researchers and the American people at large.

## **The NIH's Critical Role on Communal Health and Wellness**

The NIH is vital to the U.S.'s ability to lead the world in crucial research, science innovation and discovery. The agency's mission is to seek fundamental knowledge about the nature and behavior of living systems and the application of that knowledge to enhance health, lengthen life, and reduce illness and disability. Through the NIH's 27 Institutes and Centers (ICs), a wide range of scientific projects are funded and supported across various disciplines, including basic research, clinical trials, and epidemiological studies. Additionally, the NIH plays a key role in training the next generation of scientists, developing and maintaining competitive U.S. research infrastructure.

Congress has historically provided strong bipartisan support for the NIH's vital role, and institutions in every state have benefitted from funding investments that the NIH has granted. Together, this has enabled the agency to invest in vital initiatives for children and families. For example, child development researchers have exposed the negative effects that lead, and other toxins have on children's development. Other funded projects have used digital tools to increase media literacy, while others have looked at how to support bilingual children in educational settings, among many more. The NIH's promotion of science and innovation has consistently shown great impact not only to science and research but ultimately on the lives of children and their families.

We support efforts to ensure the NIH is delivering strong and successful scientific research for the American people. Our goal should focus on what will better enable the NIH to fulfil its mission to the betterment of the American people. To do that, it is important to recognize the complexity and nuances of the agency. Any significant changes to the agency should only come after deliberated, transparent and informed conversation, with clearly defined objectives, expectations and implementation timelines, as well as ample time to educate Congressional authorizers on the impact of changes to the NIH.

### **NIH Structure and Funding Proposals**

The current structure of the NIH allows for a specialized focus on areas of study, allowing [for efficiency in research](#) and by providing spaces for collaboration across diverse scientific fields.<sup>1</sup> Any changes to the structure, including consolidation of ICs, risks a significant change to fulfilling the NIH's mission.

We are particularly concerned by the proposal to merge the National Institute of Child Health and Human Development (NICHD) with the National Institute on Deafness and Other Communication Disorders (NIDCD) for the creation of a National Institute for

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<sup>1</sup> "Spurring Economic Growth." *National Institutes of Health (NIH)*, 31 Jan. 2023, [www.nih.gov/about-nih/what-we-do/impact-nih-research/serving-society/spurring-economic-growth](http://www.nih.gov/about-nih/what-we-do/impact-nih-research/serving-society/spurring-economic-growth).

Disability Related Research. We fear that this restructuring would greatly impact the understanding of developmental and behavioral processes of individuals not experiencing a disability and reduce one of the only significant funding streams for scientific inquiry on children's holistic development.

NICHHD's mission is to ensure that all children can grow up healthy and achieve their full potential. This involves advancing knowledge about developmental processes, reproductive health, and human growth through research. Through NICHHD-funded projects, our researchers have been able to increase our understanding of the causes of preterm birth and have developed strategies to reduce its incidence. It has funded research initiatives focused on childhood nutrition, early education interventions, parent-child interactions, addressing health disparities, support for healthy aging and overall health promotions, among other projects. It is because of NICHHD that significant contributions have been made in our understanding of human development and health, ultimately leading to improved outcomes for individuals and communities. The proposed merger might inadvertently eliminate the funding and focus for such crucial studies. We encourage Congressional officials to avoid changing the structure of the NIH, and to pay particular care with the mission of NICHHD.

Furthermore, a consolidation of ICs will also require changes to funding mechanisms. We fear this will reduce the variety of available opportunities. As each IC often has unique grant programs, initiatives, and funding mechanisms tailored to its mission, a consolidation of ICs as reflected in the proposed reform could result in the loss of specific programs, making it harder for researchers to find funding opportunities that align closely with their work. It can also impact funding priorities, as smaller or emerging areas of research might be underprioritized over more general, larger research themes. This leads to a loss of specialization, as a broader, more generalized approach might replace the tailored support for specific research areas. Smaller institutions could also be impacted. Changes in funding mechanisms that come from a reduction in ICs might inadvertently cause an increase in the competition of available grants and a need for smaller and underfunded institutions to align with new funding priorities.

### **Supporting Researchers at the NIH**

We are concerned that the proposed changes to NIH leadership could risk undermining the integrity of the scientific process and the agency's focus on biomedical and behavioral research. As this Committee looks for efficiency and accountability from IC Directors and NIH leadership positions, we are concerned that efforts to centralize decisions would reduce the autonomy of ICs Directors, diminishing the flexibilities to fund specific

initiatives and research needs, and potentially introduce unhelpful partisanship into scientific decisions.

We feel it is important to recognize the NIH's vital role in creating a vibrant, diverse, and healthy pipeline of scientific scholars. To that end, it is useful to consider how current review and grant practices enable some to succeed, while leaving others behind. We are concerned that limiting the number of grants an individual researcher can hold simultaneously (without consideration of what their role is on each grant), or imposing caps on the size of the grant, could harm the work of a researcher that is conducting multiple but impactful projects, or researchers from smaller institutions. It is not clear to us if this reform suggests expanding the definition of who is considered a grantee with the purpose of including a broader range of participants. If the proposed reform intends to define as "grantee" a principal investigator, co-investigators, consultants and other key personnel that play a significant role in the project, limiting or imposing caps on size of grants would limit the participation of a researcher, in addition to adding burdensome administrative work via more detailed reporting and compliance measures.

Lastly, we encourage consideration of how important international research collaborations are in the pursuit of scientific knowledge. Actions taken to dissuade or dampen cross-national work could have a chilling effect and may limit the U.S.'s ability to conduct rigorous cross-national comparisons and other scientific research. The NIH's position as a leader on scientific innovation occurs in part because of its ability to collaborate and share knowledge with our international community, and to gain insights from the same international community on NIH-funded projects.

### **NIH Reform: Moving Forward**

Changes to the NIH will undoubtedly impact our children, their families and the scientific community. As this Committee takes leadership on improving the NIH's ability to fulfill its mission, we encourage a conversation on the issues Congress seeks to prioritize addressing.

As it moves forward, Congress should also help ensure the NIH continues to find ways to build a generation of scientists that leverages the training and expertise of a diverse pool of researchers to conduct excellent science. Studies have shown that scholars from under-awarded backgrounds are more likely to research human subjects with a focus on socioeconomic variables, like health care and lifestyle, which is vital to our understanding

of human behavior.<sup>2</sup> In 2022, members of SRCDC proposed a series of recommendations to address initiatives within the NIH that could increase the ability for greater diversity of thought in the scientific process, including:

- Remove barriers so that scholars from under-awarded groups (e.g., non-R1 universities, scholars of color, etc.) can be part of peer review panels.
- Scale up mentorship programs with demonstrated effectiveness. The African American Mental Health Research Scientist (AAMHRS) Consortium provided training and mentoring for junior Black scholars to write successful NIH-funded proposals. This program was highly impactful, with 73% of scientists receiving federal grant funding, while 68% received recognition through honors and awards.<sup>3</sup>
- Expand and support the National Institute on Minority Health and Health Disparities (NIMHD) Training and Career development programs. The NIMHD funds training and career development activities at universities and other institutions, to develop and support the next generation of researchers.

Proposed changes to the NIH should include strong support for under-awarded but high-quality investigators, that encourage bold proposals to advance excellent science. Significant reforms should not be forced nor sudden, but instead part of an initiative that brings together experts, stakeholders, members of the scientific community and bipartisan lawmakers in hearings, engagements, and expert testimony. In addition, it should have clear objectives and a well-defined process, so that all stakeholders can properly consult, propose, consider, and inform the process. The contributions that the NIH provides to the nation, and to the world, help millions of children and families. Congress' continued bipartisan work for strong funding and support for the agency is crucial to the continued success of American scientific pursuits.

Thank you for your time and consideration.

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<sup>2</sup> Hoppe, Travis A., et al. "Topic Choice Contributes to the Lower Rate of NIH Awards to African-American/Black Scientists." *Science Advances*, vol. 5, no. 10, 1 Oct. 2019, p. eaaw7238, [advances.sciencemag.org/content/5/10/eaaw7238](https://doi.org/10.1126/sciadv.aaw7238), <https://doi.org/10.1126/sciadv.aaw7238>.

<sup>3</sup> de Dios, Marcel A, et al. "The Development of a Diversity Mentoring Program for Faculty and Trainees: A Program at the Brown Clinical Psychology Training Consortium." *The Behavior Therapist*, vol. 36, no. 5, 2013, pp. 121–126, [www.ncbi.nlm.nih.gov/pmc/articles/PMC4207083/](http://www.ncbi.nlm.nih.gov/pmc/articles/PMC4207083/).

Sincerely,

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