August 16, 2015

Francis S. Collins, MD, PhD
Director
National Institutes of Health
6705 Rockledge Drive, Suite 750
Bethesda, MD 20892


Dear Dr. Collins:

Public Responsibility in Medicine and Research (PRIM&R), a 41-year old nonprofit educational organization dedicated to advancing the highest ethical standards in research, appreciates the opportunity to submit comments in response to the draft framework that has been disseminated for an NIH-wide Strategic Plan.

As the leading sponsor of research in the US and worldwide, the NIH has long recognized the central importance of human subjects protections, the ethical conduct of science, and scientific integrity in its stewardship of the research enterprise. With its encouragement, ethics has become an integral component of scientific design, the training of scientists, grant and contract review, and the sharing and dissemination of research results. We respectfully suggest that the NIH build on this history by ensuring that its new strategic plan emphasizes the centrality that ethics plays in the research enterprise. Specifically, PRIM&R urges the NIH to carefully consider elevating ethics to a unifying element within its framework.

In addition to the two unifying principles already identified in the framework—Set NIH Priorities and Enhance Stewardship—PRIM&R encourages the NIH to incorporate the following unifying principle:

**Integrate Ethics**—NIH integrates ethics, including principles for the ethical conduct of science, robust human and animal subject protections, and scientific integrity, by ensuring that ethics is an integral component of scientific design, the training of scientists, grant and contract review, the sharing, dissemination, and assimilation of research results, and public education.

Without question, the success of the three crosscutting objectives that the NIH identifies in its framework—promoting fundamental science, improving health promotion and disease prevention, and advancing treatments and cures—rests on a scientific enterprise that is and appears to be based on ethical principles, including transparency and independence from financial and other outside interests. A new NIH-wide Strategic Plan provides an opportunity for the NIH to communicate its commitment to these ideals.
At a time of reduction in the funding of research, as well as widespread agreement that the administrative burdens associated with regulation need to be reduced, the explicit inclusion of ethics as a unifying principle of the framework will serve as a strong affirmation to the community of scientists that attending to research ethics is not a wasteful “burden” but a means to better and more sustainable research. Furthermore, an NIH-wide Strategic Plan that emphasizes ethics will promote public support for federal funding and engender public trust in biomedical research.

PRIM&R believes that ethics has been fundamental to the NIH mission and to its success. The inclusion of ethics as one of the unifying principles of the Institutes’ new strategic plan will help to communicate this fact to the scientific community and the public at large. Thank you in advance for your consideration.

Sincerely,

Alexander M. Capron
Chair, Board of Directors

David H. Strauss, MD
Chair, Public Policy Committee

Elisa A. Hurley, PhD
Executive Director

cc: Public Policy Committee
    Board of Directors