



**American Society for Investigative Pathology**  
*Investigating the Pathogenesis of Disease*

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Francis Collins, MD, PhD  
Director, National Institutes of Health  
Building 1  
9000 Rockville Pike  
Bethesda, MD 20892

Dear Dr. Collins:

The American Society for Investigative Pathology (ASIP) is pleased to provide its support for the recent National Science Board (NSB) report, *Reducing Investigators Administrative Workload for Federally Funded Research*. We are contacting you today to express our ongoing commitment to the principles underlying this important report.

ASIP is a nonprofit educational 501(c)(3) organization primarily representing the academic pathology research community. We are a society of biomedical scientists who investigate disease, linking the presentation of disease in the whole organism to its fundamental cellular and molecular mechanisms. Our members seek to ultimately apply research findings to the diagnosis and treatment of patients. ASIP advocates for the practice of investigative pathology and fosters the professional career development and education of its members. As a member of the Federation of American Societies for Experimental Biology (FASEB), ASIP supported the survey conducted by FASEB and was actively involved in FASEB's June 7, 2013 comment letter to the National Science Board Task Force on Administrative Burden.

We believe that there is much to be gained from collaboration among all parties, especially efforts jointly conducted by the National Science Board and the National Institutes of Health. We encourage NIH to work proactively with NSB in active support of the Report's four major recommendations:

1. Focus on the Science
2. Eliminate or Modify Ineffective Regulations
3. Harmonize and Streamline Requirements
4. Increase University Efficiency and Effectiveness

We join other investigators in understanding the critical need for transparency, accountability, and safety in the conduct of federally funded research. Rules and regulations can best serve all when they are streamlined and harmonized, allowing a focus on science. Of particular import is the third recommendation of the Board proposing the development and implementation of a permanent high level, interagency committee. Such an entity could prioritize the regulations to be reviewed and determine appropriate actions for each leading to reduction of the administrative burden on researchers and their institutions. We believe much could be gained through the cooperative leadership of both NSB and NIH on these issues.

As researchers who are frequently involved in human subjects investigations, ASIP members continue to support such activities as encouraging the use of a single IRB for multisite studies, eliminating continued review for all expedited and or minimal risk protocols, and the further expansion and clarification of current exempt categories. We believe there may be additional opportunities in the area of human subjects protection, which we provided during the comment period for the Advanced Notice of Proposed Rule Making on “Human Subjects Research Protections: Enhancing Protections for Research Subjects and Reducing Burden, Delay, and Ambiguity for Investigators.” We look forward to the release of the NPRM or final rule.

The American Society for Investigative Pathology supports the National Science Board's attention to this issue, and we encourage NIH to join in this process. We look forward to working cooperatively with all involved in these efforts.

Sincerely yours,

A handwritten signature in black ink that reads "Mark E. Sobel". The signature is written in a cursive style with a large initial 'M' and 'S'.

Mark E. Sobel, MD, PhD  
Executive Officer