



American Society for Investigative Pathology
Investigating the Pathogenesis of Disease

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France A. Córdova, PhD
Director, National Science Foundation
4201 Wilson Blvd
Arlington, VA 22230

Dear Dr. Córdova:

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*. 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 read the recent report with interest and support its 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 for a focus on scientific advancement. 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. To this end, we have also written to Dr. Collins to encourage NIH's involvement and support of this critical effort, stressing the need to coordinate activities between NSB and NIH

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. We look forward to working cooperatively with all involved in these efforts.

Sincerely yours,

A handwritten signature in cursive script that reads "Mark E. Sobel".

Mark E. Sobel, MD, PhD
Executive Officer