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August 16, 2024

The Honorable Cathy McMorris Rodgers
Energy & Commerce Committee
2125 Rayburn House Office Building
Washington, D.C. 20515

Via electronic submission: NIHReform@mail.house.gov

Dear Chairwoman Rodgers:

On behalf of our 40,000 members, the Academy of General Dentistry (AGD) is writing in response to your request for information (RFI) on the proposed framework for discussion of the National Institutes of Health (NIH).¹ The document proposes both structural and policy reforms.

Reorganization of Institutes

The National Institute of Dental and Craniofacial Research (NIDCR) has served the nation for over 75 years. In your NIH framework document, you propose to consolidate the NIDCR into a new institute named the "National Institute on Neuroscience and Brain Research" that would contain NIDCR, the National Eye Institute (NEI), and the National Institute of Neurological Disorders and Stroke (NINDS).

AGD opposes streamlining the existing 27 institutes into the proposed 15 institutes. We do not support the proposed consolidation because we are concerned that the new agency would not appropriately address research into our nation's oral health care needs.

AGD offers general comments that may be helpful to apply to future medical research and potential pandemics. The federal government must engage with general dentists in early-stage planning of future pandemics. Dentistry has a long and successful history of leading in infection control, as it did during the HIV/AIDS crisis. Dentists know how to limit transmission of disease via aerosol-generating procedures and were successful in limiting COVID-19 transmission.² Unnecessary regulatory and legislative burdens will only impede dentistry's successful history of infection control.

¹ Chair Rodgers Unveils Framework for NIH Reform, Requests Stakeholder Input. June 14, 2024. <https://energycommerce.house.gov/posts/chair-rodgers-unveils-framework-for-nih-reform-requests-stakeholder-input>

² Araujo, M, et. al. [COVID-19 Among Dentists in the United States, A 6-month Longitudinal Report of Accumulative Prevalence and Incidence](#). JADA 2021;152(6):425-433.

Medical scientists who are well versed in data about viral infections and pandemics and have knowledge of fundamental biology should provide the executive branch with recommendations for the best ways to mitigate disease and death. The most vulnerable populations must be targeted for extra protection.

Oversight is needed in medical research following the problematic response to the COVID-19 pandemic. Congress can ensure that 1) oversight authority is enforced and 2) provide appropriations to make funding conditional to adherence of the grant contractual metrics.³

Energy & Commerce Committee recommendations include:

- Grant Recipients Must Remain Dynamic
- Research Must Be Credible, Reliable, and Timely
- Continue Prohibition of Risky Gain-of-Function Research
- Establish Independent Review Entity for NIAID
- Demand Accountability from Grantees
- Support Independent Community Review Oversight Boards
- Mandate Foreign Grant Reporting
- Incorporate a National Security Review
- Prevent Conflicts of Interest
- Empower Agencies to Suspend Grants
- Ensure Appropriate Oversight of Animal Research

Long COVID-19 Research

The Long COVID-19 trial was initiated in 2021 to identify risk factors and causes of extended/lengthy cases of COVID-19 and to better understand treatment and prevention options for the viral disease. NIH records demonstrate that the \$1.6 billion Long COVID-19 initiative has failed to meet its goals or produce any discernable findings.⁴ This is an unacceptable outcome and a gross misuse of public funds for an expensive research project. Congress must ensure that research funding is used appropriately. NIH must deliver demonstrable benefits to the public.

³ U.S. Office of Inspector General. July 2024. ASPR DID NOT CONSISTENTLY COMPLY WITH FEDERAL REQUIREMENTS FOR AWARDED RESEARCH AND DEVELOPMENT CONTRACTS
<https://oig.hhs.gov/documents/audit/9931/A-03-20-03003.pdf>

⁴ Ladyzhets, B. Stat News. NIH documents show how \$1.6 billion long Covid initiative has failed so far to meet its goals. May 31, 2024.

Risky Research/Gain-of-Function

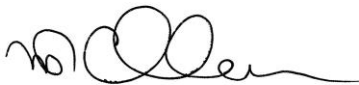
COVID-19 was detrimental to the U.S. in terms of loss of life, economic loss, and developmental and educational delays. Congress must work to prevent this type of pandemic from recurring at all costs. For these reasons, the AGD is very concerned about gain-of-function research. Multiple House and Senate committees have probed to determine the origins of COVID-19 conclusively. These inquiries have uncovered a lack of oversight and transparency from the Department of Health and Human Services (HHS), the NIH, and the National Institute of Allergy and Infectious Diseases (NIAID). Recently introduced legislation, *The Risky Research Review Act*, from Senator Rand Paul, M.D., addresses gain-of-function research: AGD is currently assessing the provisions in the bill.⁵

Conclusion

While AGD appreciates the desire to decrease administrative costs and increase efficiencies across the institutes via agency consolidation, such an effort is inappropriate. It would be a grave disservice to the American public. We reiterate our concerns that the proposed structure of the new agency would result in a decreased focus on research efforts relating to our nation's oral health care needs.

Thank you again for allowing the AGD to comment on NIH reform proposals. If you have any questions or would like to discuss our response in greater detail, please contact Daniel J. Buksa, JD, CAE, Associate Executive Director, Public Affairs, by phone at (312) 440-4328 or via email at daniel.buksa@agd.org.

Sincerely,



Merlin P. Ohmer, DDS, MAGD
President
Academy of General Dentistry



⁵ <https://www.hsgac.senate.gov/media/rep/dr-paul-introduces-risky-research-review-act-to-oversee-gain-of-function-research-funding/>
<https://www.hsgac.senate.gov/wp-content/uploads/Risky-Research-Review-Act.pdf>

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