

To:

Francis Collins, MD, PhD  
Director  
National Institutes of Health

CC:

Michael Lauer, MD  
Deputy Director for Extramural Research  
National Institutes of Health

26 September 2017

Dear Dr. Collins,

We, the 62 undersigned awardees of the NIH High-Risk, High-Reward Research Program, are writing to express our concern about the NIH's policy that broadens the definition of a clinical trial to include a great deal of basic discovery science. We join others in asking you to **delay the implementation of any rule change** until its implications have been entirely fleshed out, with input from the basic science community.

We are not alone in our concern. Over 3500 scientists have signed an open letter addressed to you [<http://ipetitions.com/petition/open-letter-nih-collins>], requesting that the NIH delays implementation of this policy. The requested delay would give the NIH more time to work with basic scientists to update its clinical trials policy so as to ensure that it does not have adverse effects on basic research communities. Those 3500 scientists believe that the clinical trials policy should ensure that research is conducted in an open, transparent, and reproducible fashion, without handcuffing discovery science. We agree with them.

In its current form, unfortunately, the policy will have a chilling effect. It will reduce the number of funding opportunities available to basic scientists, severely complicate review of discovery science proposals, and reduce access to research experience for undergrads and graduate students. Plainly, the policy hurts discovery science and the people who do it.

We agree with the analyses presented in a recent Neuron article, which noted that NIH's case studies, which are intended to clarify the types of research newly classified as clinical trials, are, in fact, rife with contradictions [[http://www.cell.com/neuron/fulltext/S0896-6273\(17\)30789-4](http://www.cell.com/neuron/fulltext/S0896-6273(17)30789-4)]. We are heartened to see NIH updating some of these case studies in response to community criticism, noting that there are now 6 versions of Case 18 and that Case 22 has been removed entirely. But the new cases remain ambiguous and still have internal contradictions (e.g., Case 18c; see <https://featuredcontent.psychonomic.org/the-nih-clinical-trials-issue-continued-a-good-try-but-we-still-have-a-problem/>). And even with these updates, the clinical trials policy adds burdens to discovery science that threaten its viability.

Your office funded us through the High-Risk, High-Reward Program because of *our* commitment to discovery science — and also because of *your* commitment to discovery science. The implementation of the clinical trials policy will negatively impact our ability to conduct our work. It will negatively impact the ability of other discovery scientists to obtain future funding through the program. In sum, support for discovery science at NIH will be substantially

impacted by this policy, to the detriment of current and future High-Risk, High-Reward awardees.

We do high-risk, basic research because we know that it is essential to downstream applied research, including legitimate clinical trials that directly improve the health of Americans and of all people. We hope that you agree with us, and will consider delaying the implementation of the new clinical trials policy.

Sincerely,

1. Samuel Mehr, Harvard University (*NIH Director's Early Independence Awardee*)
2. Erika Bergelson, Duke University (*NIH Director's Early Independence Awardee*)
3. Steve Ramirez, Boston University (*NIH Director's Early Independence Awardee*)
4. Allen Liu, University of Michigan (*NIH Director's New Innovator Awardee*)
5. Darren Lipomi, University of California at San Diego (*NIH Director's New Innovator Awardee*)
6. Kerwyn Huang, Stanford University (*NIH Director's New Innovator Awardee*)
7. Mark Schnitzer, Stanford University (*NIH Director's Pioneer Awardee*)
8. Tracey Lamb, University of Utah (*NIH Director's New Innovator Awardee*)
9. Doris Tsao, California Institute of Technology & Howard Hughes Medical Institute (*NIH Director's Pioneer Awardee*)
10. Anshul Kundaje, Stanford University (*NIH Director's New Innovator Awardee*)
11. Yakeel T. Quiroz, Massachusetts General Hospital (*NIH Director's Early Independence Awardee*)
12. Uri Hasson, Princeton University (*NIH Director's Pioneer Awardee*)
13. Lihong Wang, California Institute of Technology (*NIH Director's Transformative Research Awardee and NIH Director's Pioneer Awardee*)
14. Mitesh Borad, Mayo Clinic (*NIH Director's New Innovator Awardee*)
15. Irene Chen, University of California at Santa Barbara (*NIH Director's New Innovator Awardee*)
16. Will Ludington, University of California at Berkeley (*NIH Director's Early Independence Awardee*)
17. Michael Petrascheck, The Scripps Research Institute (*NIH Director's New Innovator Awardee*)
18. Dylan Gee, Yale University (*NIH Director's Early Independence Awardee*)
19. Leon Reijmers, Tufts University (*NIH Director's New Innovator Awardee*)
20. Jody Rosenblatt, University of Utah, Huntsman Cancer Institute (*NIH Director's New Innovator Awardee*)
21. Kristen Jacobson, University of Chicago (*NIH Director's New Innovator Awardee*)
22. Arun Wiita, University of California San Francisco (*NIH Director's New Innovator Awardee*)
23. Emery N. Brown, Massachusetts Institute of Technology, Massachusetts General Hospital, & Harvard University (*NIH Director's Transformative Research Awardee and NIH Director's Pioneer Awardee*)
24. Joanna Jankowsky, Baylor College of Medicine (*NIH Director's New Innovator Awardee*)
25. Christine Ann Denny, Columbia University (*NIH Director's Early Independence Awardee*)
26. Ed Boyden, Massachusetts Institute of Technology (*NIH Director's Transformative Research Awardee, NIH Director's New Innovator Awardee, and NIH Director's Pioneer Awardee*)
27. Meena S. Madhur, Vanderbilt University Medical Center (*NIH Director's New Innovator Awardee*)
28. Amit Etkin, Stanford University (*NIH Director's Pioneer Awardee*)
29. Gautam Dantas, Washington University in St Louis (*NIH Director's New Innovator Awardee*)
30. Bo Huang, University of California at San Francisco (*NIH Director's New Innovator Awardee*)

31. Erich Jarvis, Duke University (*NIH Director's Pioneer Awardee*)
32. Eiman Azim, Salk Institute for Biological Studies (*NIH Director's New Innovator Awardee*)
33. Sean Wu, Stanford University (*NIH Director's New Innovator Awardee and NIH Director's Pioneer Awardee*)
34. Jeremy Day, University of Alabama at Birmingham (*NIH Director's New Innovator Awardee*)
35. Erin Carlson, University of Minnesota (*NIH Director's New Innovator Awardee*)
36. Sunil Gandhi, University of California at Irvine (*NIH Director's New Innovator Awardee*)
37. Duncan Maru, Brigham and Women's Hospital (*NIH Director's Early Independence Awardee*)
38. Gabriel Kreiman, Children's Hospital & Harvard Medical School (*NIH Director's New Innovator Awardee*)
39. Nancy Kanwisher, Massachusetts Institute of Technology (*NIH Director's Pioneer Awardee*)
40. Mala Murthy, Princeton University (*NIH Director's New Innovator Awardee*)
41. Chun-Li Zhang, University of Texas Southwestern Medical Center (*NIH Director's New Innovator Awardee*)
42. Joe Nadeau, Pacific Northwest Research Institute (*NIH Director's Pioneer Awardee*)
43. Peter Bearman, Columbia University (*NIH Director's Pioneer Awardee*)
44. Gregory F. Sonnenberg, Weill Cornell Medicine & Cornell University (*NIH Director's Early Independence Awardee*)
45. Jean Bennett, University of Pennsylvania Perelman School of Medicine (*NIH Director's Pioneer Awardee*)
46. Effie Apostolou, Weill Cornell Medical College (*NIH Director's New Innovator Awardee*)
47. Elaine L Hill, University of Rochester (*NIH Director's Early Independence Awardee*)
48. Sallie Permar, Duke University (*NIH Director's New Innovator Awardee*)
49. Zhilei Chen, Texas A&M University (*NIH Director's New Innovator Awardee*)
50. Elissa Hallem, University of California at Los Angeles (*NIH Director's New Innovator Awardee*)
51. Andrew Yoo, Washington University School of Medicine (*NIH Director's New Innovator Awardee*)
52. Lili Yang, University of California at Los Angeles (*NIH Director's New Innovator Awardee*)
53. Steven T. Kosak, Northwestern University (*NIH Director's New Innovator Awardee*)
54. Alexander Marson, University of California at San Francisco (*NIH Director's New Innovator Awardee*)
55. Christina Meade, Duke University (*NIH Director's New Innovator Awardee*)
56. Lara K. Mahal, New York University (*NIH Director's New Innovator Awardee*)
57. Jesse Jokest, University of California at San Diego (*NIH Director's New Innovator Awardee*)
58. Alexander Travis, Cornell University (*NIH Director's Pioneer Awardee*)
59. Sean Bendall, Stanford University (*NIH Director's New Innovator Awardee*)
60. Aaron Esser-Kahn, University of Chicago (*NIH Director's New Innovator Awardee*)
61. Brenda Bloodgood, University of California at San Diego (*NIH Director's New Innovator Awardee*)
62. Nicholas Ingolia, University of California at Berkeley (*NIH Director's New Innovator Awardee*)