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Behavioral & Brain Sciences

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January 28, 2020

Chloe Kontos

Executive Director, National Science and Technology Council
White House Office of Science and Technology Policy

Dear Chloe Kontos,

The Federation of Associations in Behavioral and Brain Sciences (FABBS), a coalition of twenty-five scientific societies and 64 academic departments whose scientific members and faculty work to advance the sciences of mind, brain, and behavior, strongly supports the work of JCORE to address key areas that impact the U.S. research enterprise. Thank you for the opportunity to comment.

As stated, the goal of JCORE is to 'maximize the quality and effectiveness of the American research environment'. To this end, FABBS encourages JCORE to support reliable and increased investments in the federal agencies supporting science. In recent years, the administration has recommended significant cuts to science budgets. While Congress has continued to increase funding for scientific agencies, even recommending cuts is extremely detrimental to all aspects of the American research environment. Please consider the implication to early career scholars -- the future of science -- that science budgets are vulnerable and that professional prospects may be dramatically more competitive and unlikely.

FABBS supports filling two specific positions at the OSTP, *Associate Director of Science (ADS)* and *Assistant Director for Social, Behavioral, and Economic Sciences (AD for SBE)*. In past administrations, the role of ADS has been to support and advocate for basic and translational research at federal agencies; coordinate across the agencies (often via the NSTC) on regulatory matters; and track emerging issues including behavioral impacts, potential pandemics, open science, biomedical innovation, etc. Finally, the ADS oversees support and attention to broad areas of science, including the social and behavioral sciences, physical sciences, biology and biotech, nanotechnology, etc. The ADS is critical to the goals of JCORE. OSTP has a Senate-confirmed Associate Director of Technology that is filled, and Science would benefit from the same level of leadership.

Another role critical to FABBS members and to the federal scientific infrastructure, is that of AD for SBE. This position coordinates activities in



the social, behavioral, and economic sciences across the agencies. This vacancy leaves such matters to the various approaches of the federal agencies, impairing effective interagency cooperation and undermining the importance of diversity of points of view that is embodied in the interagency process. FABBS encourages OSTP to fill this role.

FABBS offers the following feedback on the specific topic areas:

- *Ensure rigor and integrity in research:* FABBS fully supports the goals of transparency and rigor in scientific research. FABBS views open science as a way to facilitate replication. While committed to the principles of open access, consistent with the broad scientific community, FABBS encourages OSTP to recognize that scientific societies depend on publishing revenues to operate, and to work with the community to appropriately advance the goals of open access while allowing and supporting scientific societies to consider alternative publication models. In order to increase replication studies, federal agencies need to provide specific incentives for researchers to pursue these studies and facilitate these efforts. JCORE need also consider that journals are less inclined to publish replication studies or null findings, and the importance of publications for career advancement.
- *Coordinate administrative requirements for Federally-funded research:* FABBS greatly appreciates and strongly supports efforts to coordinate/ reduce administrative burden for researchers. However, we caution against the risks of uniform solutions having unintended consequences.

This is particularly true when considering human subjects issues and the nature of basic behavioral science. To this end, FABBS recommends that JCORE reinstate the NSTC Human Subjects Research Subcommittee (HSRS), which had been disbanded by the previous administration in an effort to streamline NSTC committees. While appropriate for the majority of subcommittees to be "task-oriented and time-delimited," human subjects issues cannot be thought of as a short-term deliverable. Rather, the issue of research ethics needs be an ongoing effort, as it is complicated by perennial, new, and emerging technological and social issues. In the past, HSRS played an important function -- coordinating across federal agencies, creating opportunities for smaller agencies to have



their voices represented, and allowing for agencies to learn from each other, broadening transparency and fairness.

A specific opportunity for JCORE to reduce administrative burden for researchers is regarding the recently expanded definition of “clinical trial” at NIH. To reiterate, FABBS is committed to the principles of open science and our scientists are actively registering studies on portals appropriate to their science. However, the NIH decision to include basic experimental studies with humans in the scope of a clinical trial has created confusion and additional administrative burden without accomplishing the goal of sharing research data in a searchable and replicable way for other researchers.

- *Strengthen the security of America's S&T research enterprise:* FABBS has closely followed the national conversation on research security and understands the clear and specific threats. FABBS joined over 60 organizations on a Sept. 4 [letter](#) to OSTP and federal research funding agencies stressing the importance of balancing “an openly collaborative scientific environment and protecting our economic and national security.”

On behalf of FABBS, thank you for this opportunity to provide input. We look forward to continued communication with OSTP to achieve our shared goal of an optimal American research environment.

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