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July 16, 2021

The Honorable Diana DeGette  
2111 Rayburn House Office Building  
Washington, DC 20515

The Honorable Fred Upton  
2183 Rayburn House Office Building  
Washington, DC 20515

Dear Representatives DeGette and Upton:

On behalf of the Association of American Universities (AAU), thank you for your continuing commitment to improving the health of the nation and ensuring American competitiveness through robust investments in education and research. Founded in 1900, AAU is composed of America's leading research universities. AAU's 66 research universities transform lives through education, research, and innovation. AAU appreciates the opportunity to comment on the draft authorization language for ARPA-H included in the Cures 2.0 legislative proposal.

First, we strongly support the inclusion of the Research Investment to Spark the Economy (RISE) Act bill within Cures 2.0. The RISE Act will help mitigate the pandemic's harmful disruptions and impacts on students, researchers, and research supported by the National Institutes of Health, the National Science Foundation, the Department of Energy's Office of Science and ARPA-E, the Department of Defense S&T programs, NASA, National Institute of Standards and Technology, and other federal research agencies. This funding is necessary to reinforce the nation's research workforce and enterprise and help ensure that extramural research projects disrupted by the pandemic can be completed, thus preserving research investments already made by taxpayers. Relief for federal science agencies will help avoid long-term and damaging consequences resulting from the pandemic to federally-supported research, which drives American innovation, economic competitiveness, and security. Failure to provide this funding will force federal research agencies to make difficult decisions between funding the completion of existing research projects or funding new projects.

Regarding Cures 2.0's authorizing language for ARPA-H, the project is a bold idea that has great promise. First and foremost, we urge that ARPA-H investments supplement, not supplant, annual appropriated funds for the National Institutes of Health (NIH). NIH's mission is to explore and support foundational research. Discoveries from foundational research may not yield results for patients for years but they are critical to treatment advances and saving lives. The mRNA technology used to facilitate the rapid development of SARS-COV-2 vaccines was funded by the NIH more than a decade ago. Investments in foundational research, such as the longitudinal Framingham Study, the Human Genome Project, and the Cancer Atlas, have led to great improvements in cardiac care, identification of genes that lead to Alzheimer's, and improved treatment options for certain cancers, respectively.

AAU respectfully suggests that congressional ARPA-H authorizers and appropriators work together closely to ensure that ARPA-H supports new, bold, and transformative research approaches that are not duplicative of NIH efforts such as those being undertaken by the Common Fund, BRAIN Initiative, or other cross-institute endeavors such as the HEAL project on addiction. Close collaboration between a new ARPA-H and these and other existing NIH programs will be critical to prevent duplication of effort and to fully leverage federal investments. This would also ensure that the funding mechanisms for NIH and ARPA-H are separate and support the intent of the authorizing legislation.

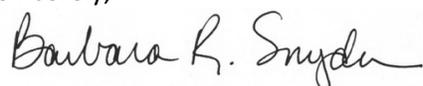
AAU aligns itself with the comments of the Ad Hoc Group on Medical Research Funding, “As you consider how to establish ARPA-H, the Ad Hoc Group urges you to work with appropriators to ensure that investments in ARPA-H are balanced with robust investment in NIH-supported, foundational, investigator-initiated research that forms the bedrock of our nation’s medical research ecosystem at labs across the country. There is room in this ecosystem for both advanced R&D approaches like ARPA-H and foundational science that is the core of NIH’s mission, but – critically – the former depends on the latter.”

As you further develop legislative language authorizing ARPA-H, we respectfully request consideration of the following questions:

- Will ARPA-H have an advisory board, and if so, how will it be comprised and seek stakeholder input on scientific priorities?
- How will ARPA-H’s funding mechanism be separated from NIH’s base funding to ensure that investigator-initiated research funding is not constrained?
- Will ARPA-H explore social science projects to bolster the adoption of advancements in health science?
- Will ARPA-H be granted the necessary authorities and new mechanisms to help overcome existing regulatory hurdles which often hamper the ability to quickly transition new medical discoveries and advances from the laboratory to the marketplace to benefit public health?
- What mechanisms will be utilized to better link those conducting research with potential customers capable of developing and distributing new drugs, diagnostics, and other products resulting from the research?

We look forward to working with you and your staff as the specifics of ARPA-H are further developed and the appropriations process advances. Thank you for considering our views.

Sincerely,



Barbara R. Snyder  
President