AMERICAN INSTITUTE OF BIOLOGICAL SCIENCES

December 23, 2025

Michael Kratsios
Director
White House Office of Science and Technology Policy
Executive Office of the President
1650 Pennsylvania Avenue
Washington, D.C. 20504

Re: OSTP RFI on Accelerating the American Scientific Enterprise

Dear Director Kratsios,

The American Institute of Biological Sciences (AIBS) appreciates the opportunity to provide comments in response to the Request for Information: Accelerating the American Scientific Enterprise issued by the White House Office of Science and Technology Policy (OSTP) on November 26, 2025.

AIBS is a scientific association dedicated to promoting informed decision-making that advances biological research and education for the benefit of science and society. AIBS works to ensure that the public, legislators, funders, and the community of biologists have access to information that can guide informed decision-making. Our 98 member organizations include scientific societies, museums, botanic gardens, and universities.

Ensuring America's continued future as a world leader depends upon sustained investments in high-quality science. From advances in medicine and public health to the innovations that underpin economic growth and national security, rigorous and impartial scientific inquiry has consistently formed the foundation of U.S. progress and economic growth.

Biological research underpins advances in human health, agriculture, environmental stewardship, biotechnology, and defense readiness. The long-standing success of the U.S. scientific enterprise rests on sustained and predictable federal investment in basic research; rigorous, independent, merit-based peer review; strong scientific integrity policies; transparency and open inquiry; and the consistent engagement of external scientific advisory panels. As OSTP considers policy updates to accelerate discovery and innovation, we urge that these foundational principles remain central. History demonstrates that when federal support for science is stable, strategically coordinated, and insulated from political, ideological, and financial interference, the nation realizes outsized returns in economic growth, workforce development, and societal well-being.

Sustained and Predictable Federal Funding for Science

A core requirement for a strong and competitive scientific enterprise is sustained, predictable funding across federal science agencies. Biological research frequently requires long time horizons to generate transformative insights, build and maintain research infrastructure, curate data and specimen collections, and train the next generation of scientists. Volatile or short-term funding disrupts research trajectories, discourages early-career investigators, and undermines the nation's ability to respond rapidly to emerging challenges such as pandemics, climate-driven ecosystem change, and food insecurity.

We recommend that OSTP emphasize policies that:

- Support multi-year, inflation-adjusted budget trajectories for key science agencies, including the National Science Foundation, the National Institutes of Health, the Agricultural Research Service and National Institute of Food and Agriculture within the U.S. Department of Agriculture, the Department of Energy Office of Science, the National Oceanic and Atmospheric Administration, and the U.S. Geological Survey.
- Preserve a balanced portfolio that includes investigator-initiated basic research alongside use-inspired and translational programs.
- Recognize federal research funding as a long-term national investment with demonstrated high returns to the economy and public welfare, rather than a discretionary expense.

Importance of Government Investment in Basic Research

Federal investment in basic research is uniquely important because it addresses questions that are too early-stage, high-risk, or broadly beneficial to attract sustained private-sector funding. Many of today's most impactful technologies—from biotechnology and genomics to advanced materials and artificial intelligence—originated in federally funded basic research programs.

In the biological sciences, foundational research into molecular mechanisms, organismal biology, ecology, and evolution has enabled downstream innovation in medicine, agriculture, conservation, and bio-based manufacturing. Continued U.S. leadership depends on maintaining robust support for this discovery-driven research base, which fuels the translational pipeline and provides the knowledge capital upon which public-private partnerships depend.

Independent, Merit-Based Peer Review

Independent, merit-based peer review is a cornerstone of scientific quality control and an essential mechanism for ensuring that federal research investments are allocated effectively, fairly, and based on evidence rather than ideology or short-term priorities. Decades of experience demonstrate that expert peer review—conducted by qualified, independent scientists with appropriate safeguards against conflicts of interest—remains the most reliable means of evaluating scientific rigor, feasibility, reproducibility, and potential impact.

We strongly encourage OSTP to reaffirm the central role of independent, merit-based external peer review in federal grantmaking and in the evaluation of research used to inform policy decisions. Policies or directives that bypass or reduce expert judgment, impose rigid or personally motivated criteria, or politicize funding decisions risk stifling innovation, discouraging high-quality research, and eroding public trust. While scientific progress depends on debate and the testing of competing hypotheses, this process must remain grounded in verifiable evidence and subject to the same standards of scrutiny for all claims. Any reforms to peer review should therefore focus on improving efficiency, transparency, and reviewer workload management while preserving independence, scientific merit, and methodological rigor as the primary determinants of funding and policy relevance.

Scientific Integrity

Strong scientific integrity policies are essential to protecting the credibility of federal science and enabling evidence-based policymaking that serves the public interest. Independent science that is free from political, ideological, and financial influence is critical to informed decision-making affecting public health, the economy, environmental stewardship, and national security. Transparent, unbiased use of scientific evidence is also central to maintaining public trust in government institutions.

We applaud efforts to strengthen and harmonize scientific integrity policies across federal agencies and recommend that OSTP ensure these policies include clear safeguards against political interference. This includes empowering designated scientific integrity officials with the authority to oversee implementation, investigate alleged violations—including those originating from agency or Administration leadership—and coordinate with agency Inspectors General as appropriate. Policies must also explicitly prohibit retaliation against federal employees, contractors, or grantees who raise good-faith scientific integrity concerns or express evidence-based scientific views that diverge from prevailing policy positions.

Role of External Advisory Panels

Federal scientific advisory committees play a vital role in providing independent expertise, strategic guidance, and horizon-scanning across disciplines. To prevent politicization and maintain credibility, agencies should establish transparent and accountable processes for nominating and selecting advisory committee members based on expertise, experience, and independence. Clear guidelines for disclosure and management of conflicts of interest—including identification of disqualifying conflicts—are essential to sustaining confidence in advisory processes.

Enabling Innovation While Preserving Core Principles

As OSTP explores potential reforms to encourage high-risk, high-reward research; novel institutional models; AI-enabled discovery; and expanded public-private partnerships, we respectfully request that these efforts build upon—and not replace—the proven foundations of the U.S. research system. Stable funding, investment in basic research, independent merit-based peer review, and scientific integrity are not barriers to innovation; they are prerequisites for it.

Policies that successfully accelerate discovery and translation will be those that complement emerging models with continued support for the broad, diverse, and distributed biological research enterprise that spans universities, museums, field stations, national laboratories, and small businesses across the country.

AIBS stands ready to work with OSTP and federal agencies to advance policies that strengthen the American scientific ecosystem. By recommitting to sustained and predictable funding, robust federal investment in basic research, independent merit-based peer review, and strong scientific integrity protections, the United States can continue to lead the world in scientific discovery and ensure that the benefits of that leadership accrue to all Americans.

We appreciate the opportunity to weigh in on this important issue. Please do not hesitate to contact Dr. Jyotsna Pandey at jpandey@aibs.org or (202) 628-1500 x 225 if AIBS can be of further assistance.

Sincerely,

Scott Glisson
Chief Executive Officer