

My name is Dr. Jonathan Stillo. I am an Associate Professor of Anthropology and Adjunct Professor of Public Health at Wayne State University in Detroit, Michigan. I work in Global Health—specifically on tuberculosis and have more than 20 years of infectious disease research experience. In that time, I have worked on or been the primary recipient of US government research grants from the National Institute of Mental Health, The National Science Foundation, The Department of Education, The Department of State, and Department of Defense. In my capacity as a professor, I supervise the funding applications of my students. Because I, and my students work on global health-related research, much of the funding they apply for comes from US government sources. The proposed rule changes will have a major negative impact on the quality and transparency of the process. Specifically, I am referring to §200.202 which states that research must align with current administration priorities, §200.205, and §200.205(d) which place the ultimate funding decision in the hands of political appointees rather than career agency staff and substantially weakens the time-honored, gold-standard of scientific assessment, peer review. Making peer review of grants non-binding will harm the quality of US scientific research. The people who are most qualified to assess the quality and potential scientific contribution are people who are experts in the field. For this reason, peer review must remain binding and §200.205(d) should be altered to reflect this. Similarly, §200.205 should be altered to remove the ability for a political appointee to override peer review results. There are other, less destructive ways for the Administration to encourage research on specific topics of interest such as opening up additional funding opportunities.

Another section of the proposed rule that negatively impacts me and my research is §200.202(e). Because I research tuberculosis, much of my research takes place outside of the USA. I conducted research in Eastern Europe for years, much of which was funded by grants from the US Government. Additionally, I collaborated with US Government branches including the Department of State and Department of Defense on projects aimed at better understanding the disease and keeping US troops abroad safe from it. I do not think these collaborations would have been possible under the proposed rule changes which hamper international collaboration. Under the proposed changes, additional steps and barriers will be required for international collaborations. Because tuberculosis research (as well as many other types of health research) must take place where the condition is more prevalent, any restrictions on where such research can take place and with whom a researcher can collaborate (including the ability to pay local partners and research sites) harms the ability to conduct important research. Ultimately, this places the USA at greater risk as infectious disease does not respect national boundaries as we have seen time and time again.

One of the most troubling things about the proposed rule changes is the general weakening and politicization of scientific research. By forcing research to follow only the Administration's priorities, we risk missing out on the serendipitous discoveries which can lead to groundbreaking treatments, and other unexpected results. We run the risk of losing the USA's status as the center of research worldwide. Please reconsider these proposed changes due to the harm they will cause to students and researchers, and the USA's scientific standing in the world.