AMERICAN INSTITUTE OF BIOLOGICAL SCIENCES

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United States of America

July 28, 2021

Eric S. Lander
Director
White House Office of Science and Technology Policy
Executive Office of the President
725 17th Street Room 5228
Washington, DC 20502

Re: SI-FTAC RFI To Improve Federal Scientific Integrity Policies

Dear Dr. Lander:

The American Institute of Biological Sciences (AIBS) appreciates the opportunity to provide comments in response to the Request for Information To Improve Federal Scientific Integrity Policies issued by the White House Office of Science and Technology Policy (OSTP) on June 26, 2021.

AIBS is a non-profit scientific society dedicated to increasing our understanding of all life. We work with our members and other partners to promote informed decision-making that advances the biological sciences for the benefit of science and society. Our more than 110 organizational members collectively represent more than 100,000 scientists, science educators, and students.

Independent science that is free of political, ideological, or financial influence is critical to the government's ability to make informed decisions that impact our public health, economy, environment, and national security. Transparent decision-making that is based on unbiased and independent scientific research and data is important for building public trust in government decisions. We applaud the Administration's intentions to help agencies

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strengthen their scientific integrity policies to improve the use of science in policymaking.

In order to be effective in their jobs, it is important for federal scientists be able to communicate freely about their work with peers, journalists, and the public. It is critical for OSTP to ensure that each agency develops a public communications policy that promotes and maximizes openness and transparency. Such a policy should include a provision to allow agency scientists to speak freely to the media and the public, including on social media, about scientific and technological matters based on their official work without the need for approval or clearance by the agency. Additionally, we encourage OSTP to ensure that government scientists are allowed to present viewpoints publicly that extend beyond their scientific findings, for example about policy or management matters, so long as they make clear that they are presenting their individual opinions and not speaking on behalf of the agency.

Additionally, more safeguards are needed to ensure that scientific information that is being communicated to the public is accurate, based on research, and clearly communicates scientific uncertainties. In recent years, there have been many instances of pseudo-scientific information being published on an agency's website. To prevent future instances of false information being shared, agencies should include scientists in the process of preparing and reviewing science-based content for public dissemination.

It is also critical to establish clear guidelines and procedures for federal employees, as well as federal contractors and scientists supported by federal funding, for reporting violations of scientific integrity. Policies should explicitly prohibit retaliation against employees, contractors, or grantees who raise concerns about scientific integrity or express scientific opinions that diverge from those of the Administration or the agency.

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Political interference in science erodes public trust in the federal government. Decision-making should be based on unbiased scientific evidence and expert advice. Scientific integrity policies at all federal agencies must protect science and scientists from undue political interference by establishing scientific integrity officials who have the power to oversee the implementation and improvement of these policies. These officials should also be empowered to independently investigate political interference and other violations of scientific integrity policies, including those coming from agency and Administration leadership, by working with and informing the Inspector General.

Peer review is a central tenet of science. The OSTP should ensure that all data and research findings used to support policy decisions undergo rigorous peer review by qualified experts. Agencies that perform research should aim for independent review of its research in order to ensure that its work is of the highest quality and to sustain public trust in its scientific work. Furthermore, it is important to establish mechanisms to prevent the politicization of research funding by ensuring that grant review processes are independent and based on scientific merit.

Federal scientific advisory committees, whose members are drawn from academia, state and local governments, industry, and the nonprofit sector, provide valuable expertise and advice on a variety of issues that impact government decision-making. To prevent politicization of these panels, it is imperative that agencies establish clear policies that improve the transparency and accountability of the processes and criteria for nominating and selecting qualified committee members. The OSTP should ensure that agencies work to establish guidelines around disclosure of conflicts of interest and to identify which conflicts would disqualify individuals from serving on advisory committees.

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Finally, as the January 2021 Memorandum on Restoring Trust in Government Through Scientific Integrity and Evidence-Based Policymaking suggests, it is important for each agency to conduct routine scientific integrity and ethics training for all its employees and contractors who work on science or related issues to ensure they are fully aware of their rights and responsibilities, including their rights regarding dissemination of research findings and their responsibility to report waste, fraud, abuse, and scientific misconduct.

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