



OFFICE OF GOVERNMENT AND PUBLIC AFFAIRS
1436 Duke Street • Alexandria, VA 22314
www.populationassociation.org • www.popcenters.org • 301-565-6710 x 1006



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November 8, 2023

Submitted electronically to: <https://osp.od.nih.gov/comment-form-draft-scientific-integrity-policy-for-the-national-institutes-of-health/>

To whom it may concern:

On behalf of the members of the Population Association of America (PAA) and Association of Population Centers (APC), we are pleased to respond to a request from the National Institutes of Health (NIH) for public comments on the agency's draft Scientific Integrity Policy.

As you may know, PAA and APC are two affiliated organizations that together represent over 3,000 social and behavioral scientists and the over 40 population research centers that receive federal funding and conduct research on the implications of population change. Our members, which include demographers, economists, sociologists, and epidemiologists, conduct scientific and applied research, analyze changing health, demographic, and socio-economic trends, develop policy and planning recommendations, and train undergraduate and graduate students. Their research expertise covers a wide range of issues, including adolescent health and development, aging, health disparities, immigration and migration, marriage and divorce, education, social networks, housing, retirement, and labor. NIH is the primary source of competitive, discretionary grant funding supporting the population sciences. As a result, PAA and APC monitor and often respond to proposed changes governing NIH extramural research activities.

Strengthening Federal scientific integrity policy has been a major priority for the Biden Administration. PAA and APC appreciate the White Office of Science and Technology Policy (OSTP) embracing this priority and leading efforts to: promote public trust in Federal scientific agencies; improve the communication of scientific and technological information; encourage adoption of effective scientific integrity policies and practices; and enhance support for the scientific workforce. To that end, PAA and APC [submitted comments in 2021](#), in response to OSTP's Request for Information, "To Improve Federal Scientific Integrity Policies."

We are pleased that NIH is aligning its scientific integrity policy and practices to reflect priorities outlined by OSTP and to make the agency's policy consistent with the Department of Health and Human Services' Scientific Integrity Policy. The NIH proposal clearly details specific roles and responsibilities of its proposed Chief Scientist, Scientific Integrity Official, and NIH Scientific Integrity Council.

Given the nature of these positions, we understand why the policy does not stipulate advisory or participatory roles for outside experts. Nonetheless, we urge NIH to reassure the scientific research community that these officials and council will seek input from stakeholders when it is appropriate and communicate relevant information in a timely and clear manner.

Thank you for considering our views as you develop the agency's final scientific integrity policy.

Sincerely,

A handwritten signature in black ink, appearing to be 'L Berkman', with a long horizontal stroke extending to the right.

Dr. Lisa Berkman
2023 PAA President

A handwritten signature in black ink, appearing to be 'J Brand', with a large, stylized 'J' and a long horizontal stroke extending to the right.

Dr. Jennie Brand
2023-2024 APC President