

May 26, 2026

National Institutes of Health  
Office of the Director  
9000 Rockville Pike  
Bethesda, Maryland 20892

Re: Comments on a Framework for the NIH-Wide Strategic Plan for Fiscal Years 2027-2031  
(Submitted on-line at [Request For Information](#))

The Association for Academic Pathology (AAPath) appreciates the opportunity to provide input into the NIH's strategic plan framework. AAPath is a non-profit society that serves as the voice of academic departments of Pathology in the U.S. and Canada. AAPath provides leadership and advocacy for the dynamic discipline of Pathology to enable academic departments to meet the demands of their three missions: medical education, research, and practice.

We have framed our response for each priority and goal as benefits, drawbacks, opportunities and challenges, as described in the request for information.

### **Priority 1: Research Areas**

#### **Goal 1: Advance Foundational Knowledge of Human Health and Disease**

- **Benefits:** Major breakthroughs in ability to diagnose and treat disease start with basic science research. As an example, the discovery of polymerase chain reaction and CRISPR technologies allowed for more accurate pathogen identification and enabled reversal of some human genetic mutations.
- **Drawbacks:** Many drugs that work in mice and rats do not work in humans for many reasons. While simple *in vitro* systems involving human cells are very valuable for high-throughput screening and toxicity testing, these "organs-on-a-chip", no matter how sophisticated, will not (within the timespan of this strategic plan) faithfully reconstitute the complex physiologies or immune regulation that are uniquely present *in vivo*. Furthermore, these technologies will not be widely available, inexpensive, or scalable enough to be used by all but the most highly-funded labs.
- **Opportunities:** Animal experimental models remain valuable for providing insights into physiology, pathogenesis and natural history of disease. We urge the NIH to maintain commitment to basic science research with high levels of funding for projects that pursue basic and translational science employing both animal models as well as newer methods.
- **Challenges:** While animal models are controversial with the public, there are not yet any adequate replacements at the level and quality necessary to improve human health. Development of these models must be funded through NIH grant opportunities.

#### **Goal 2: Prevent Disease and Promote Health Across the Lifespan**

- **Benefits:** Good public health is the cornerstone of a vibrant population. Public health measures such as clean drinking water, food inspection, vaccines, and sanitation have

improved health and extended lifespan across the globe. Translating basic research discoveries to application and effectiveness in human populations and communities is the natural extension and ultimate measure of scientific success.

- Drawbacks: Cohorts of research subjects have not adequately represented all populations. Physiology changes across the lifespan change in ways that we are only beginning to understand, including changes in microflora, metabolism and ability to respond to drugs. Recruiting cohorts of children and senior citizens where reasonable should be emphasized, just as clinical trials must now include women.
- Opportunities: The NIH should support preclinical animal models that consider the variety of factors that complicate the response to disease, such as the study of stroke or heart disease in animals that are aged, diabetic, hypertensive, and/or obese. Animal models incorporating all of these factors will be much more expensive to breed and maintain. Special increases in budget allowance should be allowed for investigators willing to develop and use such models. This may also lead to animal models in which response to experimental drugs is much closer to that in humans.
- Challenges: Perhaps the biggest threat to good public health is the mixed messages people are receiving from various social media sources and the growing distrust of science. (See comments for Priority 3, Goal 2). The NIH should emphasize promoting good public health messaging and practices.

## **Priority 2: Research Capacity**

### **Goal 1: Develop and Sustain an Interdisciplinary Research Workforce**

- Benefits: The complexity of newly discovered biological mechanisms requires more interdisciplinary scientific approaches, bringing together ideas and skills from diverse fields traditionally not found in a single lab. Break-through discoveries come from the intersection of diverse disciplines and is evident in the large numbers of authors, disciplines, and institutions seen on the title pages of many primary research papers.
- Drawbacks: Many talented early career faculty are in non-tenure track positions, which place them at increased risk of leaving research careers due to lack of career opportunity and security.
- Opportunities: NIH career development programs can be enhanced to address these issues, including support for non-tenure track researchers. These need to include researchers in non-traditional disciplines and those who can cross institutional units (i.e. core services, bioinformaticians, and statisticians). This would expand cadre of multi-disciplinary scientists for team science.
- Challenges: Talent is frequently lost to industry's lucrative salaries. Grant-funding can never truly compete but must increase so that salaries are deemed more "livable".

### **Goal 2: Build, Improve, and Sustain Research Resources and Infrastructure**

- Benefits: Strong institutional core facilities are the foundation of successful research programs since they provide expensive infrastructure, expertise, and a level of quality assurance that could not be supported by an individual research laboratory. They also create interactive opportunities for researchers to share ideas and form collaborations.

- Drawbacks: Not all universities have the resources to develop core facilities/services. It is often not possible to collaborate with or use the facilities at neighboring universities.
- Opportunities: NIH should support grant funding to form core services and should take this to the next level by creating opportunities to develop a strong national network of core facilities for genomics, proteomics, imaging, bioinformatics, biospecimen banking etc. The NIH should also invest in training, funding, and retaining quality scientists to run such facilities. These could perhaps be modeled after the network of national primate centers. Plans for sharing resources and/or services could be a requirement for funding of such grants.
- Challenges: Creating a nationwide network for core services requires culture change to enhance the spirit of collaboration and sharing, and to create IT interoperability for communication and info gathering. These will enhance team science and the level of rigor and collaboration necessary for impactful large-scale projects and discovery.

### Priority 3: Research Operations

#### Goal 1: Enhance Scientific Stewardship and Decision-Making

- Benefits: Enhancing stewardship and decision-making (Goal 1) improves public trust in science (Goal 2) and can lead to greater public support via tax dollars to fund grants and other NIH programs, as well as public confidence in using new devices, diagnostics, treatments and cures created by NIH-funded scientific research to improve health.
- Drawbacks: Many scientists are from outside the USA and are the victims of xenophobia, eroding trust. Many grant review panels as well as the FDA do not always have the broad range or level of expertise necessary to achieve trust.
- Opportunities: Ensure that grant reviews are conducted by panels of individuals with appropriate expertise and who represent the public interest.
- Challenges: Experts are hard to find and have limited time for participation in reviews.

#### Goal 2: To Improve Public Trust in Science

- Benefits: As noted above, enhancing stewardship and decision-making (Goal 1) is critical to improving public trust in science (Goal 2), leads to greater public support via tax dollars to fund grants and other NIH programs, and creates public confidence in using new devices, diagnostics, treatments and cures created by NIH-funded research.
- Drawbacks: Trust has been declining worldwide in all industries and disciplines for many years ([2025 Edelman Trust Barometer | Edelman](#))
- Opportunities: Health care is among the industries where trust is highest, despite an overall decline. (page 47, [2025 Edelman Trust Barometer | Edelman](#))
- Challenges: Media is among the most distrusted industries. Social media in particular ranks the lowest in trust and cannot be counted on as a reliable method in sharing information to build the public trust. ([2025 Edelman Trust Barometer | Edelman](#)) New communication methods and programs must therefore be developed.

Sincerely,  
Association for Academic Pathology