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Dear Representatives DeGette and Bucshon,

Thank you for your leadership in advancing biomedical research and for this opportunity to respond to your Request for Information on the next iteration of the 21st Century Cures Act (Cures 2.1). The Academy for Radiology & Biomedical Imaging Research (Academy) is a non-profit advocacy organization based in Washington, D.C. Our primary mission is to advocate on behalf of all the stakeholders in the medical imaging research community for robust and consistent federal investments in medical imaging research at NIH and other federal agencies.

Regarding Cures 2.1, the Academy is encouraged by the interest in advancing science and biomedical research. There is little debate that the original 21st Century Cures Act was a success in promoting targeted areas of research, including the development of innovative biomedical imaging technologies and the resulting applications. The Academy is pleased to submit comments concerning the Advanced Research Projects Agency for Health (ARPA-H) and the Innovation Account programs established by the Cures Act in 2015 and looks forward to working with you to ensure a bill is passed that seeks to advance groundbreaking treatments and cures for those who need it most.

Advance Research Project Agency for Health (ARPA-H)

The Academy is grateful for your leadership in establishing the Advance Research Projects Agency for Health (ARPA-H). ARPA-H adds a new dimension to our R&D ecosystem with its goal of catalyzing groundbreaking advancements in science and medicine. Since its inception in 2022, ARPA-H has met early milestones identifying well-defined healthcare gaps to expedite better outcomes for the health of all Americans.

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As a result of your leadership, Congress wisely created ARPA-H as an independent agency, that reports directly to the Secretary of the Department of Health and Human Services. Creating an agency that has a culture and reporting structure separate and distinct from the National Institutes of Health (NIH) and other agencies empowers the agency to pursue an ambitious and visionary mission. As you, and others in Congress, consider ways to transform the NIH, the Academy urges you to maintain ARPA-H as an independent agency. ARPA-H is unique among funding agencies in its focus on accelerating life-changing health solutions. While still very new, its impact is already being realized.

Additionally, as you are aware, there are congressional plans that propose merging several Institutes and Centers at the NIH. The Academy is strongly opposed to these downsizing proposals, especially merging the National Institute of Biomedical Imaging and Bioengineering (NIBIB), National Center for Advancing Technologies (NCATS), ARPA-H, and the Common Fund. NIBIB has been very successful in generating start-ups, leveraging new technologies, and developing clinically translatable AI technology. We risk losing this unique scientific program for radiology, imaging, and bioengineering innovation if NIBIB should lose its independence. One example of NIBIB success is that recent data has shown that more patents have been filed from NIBIB than any other NIH institute. It is not only a catalyst for researchers looking to expand current imaging technologies, but also an economic driver that produces innovations and patents, which in turn lead to more inventions, greater start-up activity, and lower unemployment.

Innovation Account

The 21st Century Cures Act provided multi-year funding through the NIH Innovation Fund for four highly innovative scientific research initiatives: the Precision Medicine Initiative (PMI), the Brain Research through Advancing Innovative Neurotechnologies® (BRAIN) Initiative, the Cancer Moonshot, and the Regenerative Medicine Innovation Project. Due to the investment in the Innovation Account programs, researchers have been able to pioneer cutting-edge technologies in imaging and radiology that have improved our understanding of a wide range of disorders and diseases like addiction, Alzheimer's disease, and cancer.

Understanding that many large-scale initiatives need the support and dedication of Congress, we urge you to consider a more stable, predictable funding structure if you elect to reinvest in these projects or choose to launch new, equally ambitious projects. The fluctuations in resources from year to year posed challenges for multi-year projects. Minimizing such fluctuations will prevent artificial stops and starts that are inconsistent with the NIH peer review and research processes and will help optimize planning for how the funds could be used. The Academy appreciates your commitment to biomedical research, and we urge your continued support of stable, meaningful growth above inflation across NIH.

The Academy welcomes the opportunity to further engage with you and provide additional comments when appropriate. In the meantime, please do not hesitate to contact me if you have any questions.

Best,

Lynn Marquis

Lynn Marquis
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