

July 28, 2021

Scientific Integrity Fast-Track Action Committee
Office of Science and Technology Policy
1650 Pennsylvania Ave., NW
Washington, DC 20504

Submitted by Carol H. Wysham, MD, President of the Endocrine Society, on behalf of the Endocrine Society, a professional society.

Dear Members of the Scientific Integrity Fast-Track Action Committee,

The Endocrine Society appreciates the opportunity to provide comments to help improve the effectiveness of Federal scientific integrity policies to enhance public trust in science. Founded in 1916, the Endocrine Society is the world's oldest, largest, and most active organization dedicated to the understanding of hormone systems and the clinical care of patients with endocrine diseases and disorders. Our members include basic and clinical researchers who work to advance scientific discoveries that improve public health. As a Society, we support endocrine research, education, and clinical practice in an ethical manner with excellence, transparency, and the highest integrity.

Our members are concerned about barriers to the effective translation of accurate scientific information to policy and regulatory action. In addition, our members are aware the challenges that communities, scientific organizations, and governments face in delivering the benefits of scientific knowledge to the public. In our comments, we identify several areas where Federal agencies could adopt more effective policies and practices improve the communication of scientific and technological information

Agencies should support community engagement

The use of scientific information in the public interest requires effective strategies to translate scientific information about the health effects of hazards into restrictions or guidance on the use of hazardous substances. Such strategies require resources, both financial and human; one barrier to the effective and unbiased dissemination of research results is the concentration of such resources among specific actors, often including regulated industries. We are concerned that the existing system to develop, promulgate, and enforce regulatory decisions often involves greater representation from regulated interests relative to the communities affected by pollution or scientists generating knowledge about the health effects of chemical pollution. This may be in part because representatives of the



scientific community, including professional associations like the Endocrine Society, often must volunteer their time and effort to present independent expertise and guidance to regulatory agencies or contribute to discussions related to chemical safety. The time and effort involved in such contributions reduces availability for teaching, research, or other activities for which academic scientists are generally compensated and influence retention and promotion decisions.

Free diffusion of scientific information requires mechanisms to support the participation of scientists in education and policymaking at all levels. It also requires engagement from diverse disciplines to develop outreach and communication strategies that truly resonate with the intended audiences. **We encourage Federal agencies to adopt systems and modalities that empower community and academic scientists to participate in such activities.** Remote participation in meetings and ad hoc participation by specific subject matter experts may reduce barriers due to travel or schedule conflicts for academic researchers. Financial support for the participation of scientists or representatives from community groups should also be considered to ensure a diversity of perspectives and participation from under-resourced institutions or communities.

Safeguards should be implemented to protect against Conflict of Interest

While overt disinformation campaigns distort science and influence public opinion, regulatory agencies may also be captured by regulated entities through the distortion of scientific information. Conflicts of interest (COI) throughout regulatory processes are often underreported or undisclosed, with different agencies and systems having different standards and rules for monitoring, disclosing, and managing COI. In the extreme, this can lead to regulatory agencies that rely principally on science that is promoted by conflicted stakeholders. Conflicts of interest can also be generated through industry/academic partnerships. In an environment of limited government spending on investigator-initiated research, such relationships are often necessary to allow research groups to continue to operate; however, they can also introduce bias that may influence the design of research studies and/or the reporting of results.

Pervasive COI prevent the full and unbiased utilization of all scientific information to benefit public health, denying the public the full human rights afforded by scientific progress. **Systematic approaches to the identification and management of COI need to be developed and applied to every Federal agency's decision-making processes.** This includes developing transparent processes to ensure that agencies do not themselves become sources of disinformation. Where appropriate, penalties should exist for failing to disclose relevant COI.



To ensure that academic scientists have sufficient financial resources to preclude relationships that may present COI, **robust, sustainable publicly funded support for investigator-initiated research must be maintained.** Funding programs should be projected to increase with inflation, and consider the resources required for publishing scientific work. We note that the well-intentioned trend towards open access publishing has shifted more of the costs of publication onto researchers themselves, further stretching already limited budgets and creating unintended barriers to distribution of data and results. For example, researchers may be forced to publish in a journal that is less expensive, but less relevant to their field of study, preventing their research from reaching the appropriate audience. Or they may be forced to publish in a “predatory” journal with less stringent editorial controls and peer-review processes.

Agencies should encourage collaboration between academic and government scientists

Better collaboration between regulators and academics will more rapidly translate new scientific information for greater public benefit; however, it requires a willingness for regulatory agencies to be adaptable and open to new systems and approaches. For example, we applaud the aims and goals of the CLARITY-BPA study to reduce barriers between the US FDA and grantees funded by the National Institutes of Health (NIH), but we were disappointed that the FDA prematurely released a statement on the safety of BPA that did not take into account the totality of effects found in the academic studies. **We therefore urge Federal agencies to identify and implement ways to reduce cultural barriers that exist between scientists and regulators – mutual understanding, collaboration, and validated resources will better promote scientific progress and the diffusion of research results.**

The Endocrine Society shares the Administration’s goal to develop sound policy and make evidence-based decisions guided by the best available science and data and we look forward to learning more about the outcomes of the interagency task force’s review of agency integrity policies. If we can be of further assistance, please contact Joe Laakso, PhD, Director of Science Policy at jlaakso@endocrine.org.

Sincerely,

Carol H. Wysham, MD
President, Endocrine Society