



American Society of Human Genetics

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National Institutes of Health (NIH)
Department of Health and Human Services
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Re: Request for Information (RFI): Inviting Comments and Suggestions on a Framework for the NIH-Wide Strategic Plan for Fiscal Years 2027-2031 (NOT-OD-26-047)

The [American Society of Human Genetics](https://www.ashg.org/) (ASHG) welcomes the opportunity to provide comments on the NIH-Wide Strategic Plan for Fiscal Years 2027-2031. ASHG is the leading professional society dedicated to advancing human genetics and genomics research, supporting a community of 8,000 members who share a common goal that people everywhere realize the full potential and benefits of human genetics and genomics.

Below are our comments on the proposed framework of the strategic plan:

Priority 1: Research Areas

Sustaining Fundamental and Cross-Cutting Biomedical Research

ASHG strongly encourages NIH to reaffirm its long-standing commitment to fundamental research as the cornerstone of the biomedical enterprise. Many of the most transformative advances in human genetics and genomics, including genome sequencing technologies, gene editing, and rare disease diagnosis, originated in curiosity-driven research without immediate clinical application. A strong and predictable investment in discovery science enables downstream innovation across institutes and centers and ensures the United States remains a global leader in biomedical research.

ASHG also urges NIH to highlight cross-cutting research efforts that transcend IC boundaries. Human genetics and genomics exemplifies cross-disciplinary science, serving as the foundation for understanding biological mechanisms that underlie health and disease. Advances in human genetics and genomics inform virtually every area of biomedical research, intersecting with neuroscience, cancer research, infectious disease, environmental health, and rare and common diseases. As such, the FY27-31 Strategic Plan should articulate how NIH will facilitate and incentivize collaboration across ICs, reduce administrative barriers, and ensure that strategic priorities are aligned around shared scientific foundations, including human genetics and genomics research. In addition, the plan should explicitly recognize the importance of research infrastructure, including model organisms, core facilities, and shared research resources, that enables discovery across multiple scientific domains. Capacity-building investments, particularly at research institutions serving emerging scientific communities, are essential to sustaining innovation nationwide. The Strategic Plan should describe how it will be operationalized by ICs and reflected in funding decisions. Clear guidance on how NIH-wide priorities shape IC-specific strategies will improve transparency, support long-term planning by the research community, and reinforce confidence in a stable federal research environment.

Delivering Clinical, Scientific, and Public Health Impact

The *All of Us* Research Program is one of the world's largest and most comprehensive integrated datasets and is a critical component of NIH's efforts to prevent disease and promote health across the lifespan. Serving as the nation's precision medicine biobank, the program provides a national platform that reduces duplication, accelerates research across diseases, and helps ensure continued U.S. global leadership in precision medicine.

Nearing 900,000 participants, this program has identified more than 5,490 individuals with serious, actionable genetic risks and informed over 145,000 participants about medication-related genetic differences, supporting safer and more effective care. By building a large, longitudinal research resource that integrates genomic data with biospecimens, lifestyle, electronic health records, and real-world data, *All of Us* enables researchers in all 50 states to better understand disease risk, progression, and response to interventions at every life stage.

Priority 2: Research Capacity

Building a Predictable and Sustainable Biomedical Workforce

The NIH-Wide Strategic Plan for FY27-31 presents an important opportunity to articulate a clear vision for a stable, sustainable biomedical workforce. Predictability in funding, grant mechanisms, and policies is essential to attracting, training, and retaining the next generation of scientific talent from around the world.

ASHG emphasizes the importance of sustained support for early-stage investigator (ESI) funding mechanisms, continued investment in training and professional development programs, and policies that ensure equitable access to funding opportunities across career stages and institution locations.

Recent operational changes, such as constraints associated with multi-year funding mechanisms, have, in some cases, had unintended consequences for universities' ability to admit graduate students and invest in long-term workforce development. The Strategic Plan should acknowledge these challenges and outline principles that balance fiscal stewardship with workforce sustainability.

Merit-Based Peer Review Fosters Trust

ASHG supports NIH's long-standing commitment to merit-based, peer-reviewed grant funding. This system remains the global gold standard for identifying the most promising, innovative, and impactful science. Maintaining the integrity and independence of peer review is critical to ensuring that federal investments are guided by scientific excellence and public health need. Any erosion of this process risks undermining confidence in federally funded research and could deter talented scientists from pursuing careers in biomedical research. NIH should reaffirm its commitment to independence from political interference and to preserving the integrity of scientific decision-making. A research enterprise that is guided by evidence, peer review, and transparency is critical to maintaining public trust and attracting talent to public service and research careers.

Priority 3: Research Operations

Data Sharing and Harmonization

ASHG supports NIH's leadership in data sharing, harmonization, and responsible use of artificial intelligence, and encourages these efforts to be central to the Strategic Plan. Advances in genomics increasingly rely on large, interoperable datasets that can be responsibly shared and reused across research communities.

Many of the most pressing questions in human genetics and genomics, particularly those related to rare diseases and complex traits, require datasets that are broader in scope than any single country or institution can generate alone. Data sharing and harmonization are therefore necessary to enable effective global research consortia and international partnerships that drive greater discovery and translational impact. Coordinated standards for data collection, annotation, consent, and governance facilitate this international collaboration by ensuring that data can be integrated and interpreted consistently across studies. These shared standards help ensure that research findings are broadly applicable for all people and can be translated into clinical and public health benefit.

However, the cost of preparing, curating, and harmonizing data for deposition can be significant and is often borne directly by investigators, reducing funds available for discovery research. ASHG urges NIH to explore new funding models that directly support data infrastructure, including centralized resources, dedicated data curation funding, or institute-level support mechanisms that reduce burdens on individual grants.

The plan should also emphasize transparent methods, validated tools, high-quality data standards, and appropriate incentives that support rigorous research practices. Investments in artificial intelligence and computational tools should be accompanied by safeguards to ensure equity, minimize bias, and uphold interpretability and scientific validity.

Finally, NIH should articulate how emerging federal priorities related to artificial intelligence and data governance will be integrated into biomedical research in ways that support innovation while protecting scientific integrity, participant privacy, and public trust.

We look forward to the opportunity to be a resource to NIH on this and other genetic research related issues. If you have any questions, please contact Karina Miller, PhD, (Kmillier@ashg.org) at ASHG.

Sincerely,



Susan A. Slaugenhaupt, PhD
ASHG President