

# For Reinstatement of the NHRPAC

In September 2003, the Bush Administration allowed the charter of the National Human Research Protections Advisory Committee (NHRPAC) to expire. APSA and other scientific societies wrote to Health and Human Services (HHS) Secretary Tommy Thompson urging the reinstatement of NHRPAC which had been ably advising HHS on ways to improve the protections of human participants in scientific research, including social science research. The Bush Administration did not reinstate NHRPAC and is in the process of establishing a new committee. Neither the timing nor composition of the committee are certain.

Dear Secretary Thompson,

The undersigned scientific societies and organizations are deeply concerned by the restructuring of the scientific advisory committees currently underway at the Department of Health and Human Services.

Our organizations represent social and behavioral scientists, a group that includes psychologists, sociologists, anthropologists, economists, historians, political scientists, statisticians, geographers, lawyers, linguists, social workers, and demographers. As researchers who spend much of their time devoted to the examination of human behavior, we are especially troubled by the dissolution of the National Human Research Protection Advisory Committee (NHRPAC). Created two years ago and charged with advising HHS on ways to improve the protections of human subjects participating in scientific studies, the non-partisan NHRPAC was providing a valuable service to both the scientific community and the community of potential research participants. Researchers have always been concerned with preserving the safety of those who generously volunteer to participate in research, and NHRPAC members, many of them researchers themselves, have been providing their expertise to create a set of national standards to which all research involving human subjects must be held.

We are particularly concerned about the discontinuation of the work that was being done by NHRPAC's Social and Behavioral Sciences Working Group. This group was charged with providing guidance on critical issues specific to the behavioral and social sciences, to regulators, oversight bodies, and researchers. The group was in the midst of developing guidance on such issues as informed consent, international research, school-based research, field, ethnographic, and qualitative research. The sudden disbanding of NHRPAC has been a major setback for the research community.

We are aware that there is talk of the committee being reconstituted with new members. We urge you to consider the importance of continuity of expertise. The complexity of human participants issues is such that the success of the advisory committee is in some part dependent upon membership continuity; the formation of a completely new committee would be costly in terms of lost knowledge, experience, and time. It is our hope that the Department of Health and Human Services will seek the advice of the scientific community when NHRPAC is reconstituted, both for member nominations and to help ensure continuity in substantive issues, including those issues addressed by the Social and Behavioral Sciences Working Group that affect social and behavioral scientists who conduct research using human participants.

Thank you for your time. We look forward to working with you when it is time to reassemble NHRPAC. If you have questions or would like to discuss this matter further, please do not hesitate to contact Jill Egeth, Ph.D., of the Federation of Behavioral, Psychological, and Cognitive Sciences at 202-336-5922 or [jegeth@fbpcs.org](mailto:jegeth@fbpcs.org).

Sincerely,

The Federation of Behavioral, Psychological, and Cognitive Sciences:

- American Educational Research Association
- American Psychological Association
- Association for Applied Psychophysiology and Biofeedback
- Association for Behavior Analysis
- Behavior Genetics Association
- Cognitive Science Society
- Human Factors and Ergonomics Society
- International Behavioral Neuroscience Society
- International Society for Developmental Psychobiology
- National Academy of Neuropsychology
- Psychometric Society
- Psychonomic Society
- Society for Computers in Psychology
- Society for Judgment and Decision Making
- Society for Mathematical Psychology
- Society of Multivariate Experimental Psychology

## **American Political Science Association**

American Psychological Society  
American Sociological Association  
Association of Population Centers  
Center for the Advancement of Health  
Consortium of Social Science Associations

Institute for the Advancement of Social Work Research  
Population Association of America  
Society for Research on Child Development  
The Alan Guttmacher Institute  
The Gerontological Society of America  
The Linguistic Society of America