

December 4, 2024

The Honorable Patty Murray
Chair
U.S. Senate Committee on Appropriations
154 Russell Senate Office Building
Washington, DC 20510

The Honorable Susan Collins
Vice Chair
U.S. Senate Committee on Appropriation
413 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Tom Cole
Chair
U.S. House Committee on Appropriations
2207 Rayburn House Office Building
Washington, DC 20515

The Honorable Rosa DeLauro
Ranking Member
U.S. House Committee on Appropriations
2413 Rayburn House Office Building
Washington, DC 20515

Dear Chair Murray, Vice Chair Collins, Chair Cole and Ranking Member DeLauro:

On behalf of the undersigned professional societies, associations and academic institutions representing a broad range of scientific, public health and clinical professionals, we write to express our strong concern with including a blanket ban on gain-of-function research funding in the final Fiscal Year (FY) 2025 appropriations bills for the Labor, Health and Human Services, Education and Related Agencies Subcommittee¹ and the State, Foreign Operations, and Related Programs Subcommittee².

While we understand and share lawmakers' intention to protect national security, we strongly caution against implementing an overarching ban on any gain-of-function research, an action which could be counterproductive to American interests. Instituting such a ban would diminish U.S. leadership in the scientific community, adversely impact public health and readiness, and could leave our active military members in harm's way.

Gain-of-function techniques are essential in life sciences research. The loss of gain-of-function research funding would essentially stop all research on pathogens including influenza, RSV, and SARS, and would harm life-saving health programs that serve all Americans and the global community. Additionally, because the proposed bill language refers to "gain-of-function" research, which is a non-technical term that captures a broad swath of research, much of which does not have security implications, we are concerned that implementing the prohibition will have inadvertent consequences that go far beyond or fall short of Congress's intention.

While we understand that there may be concerns with inappropriate applications of research deemed "gain-of-function", with adequate guidance, oversight, and safety standards in place, we can prevent those types of projects from going forward without hampering valuable research that would protect and enhance our nation's health security and the United States' ability to remain a leader on the global stage. Existing policies at the institutional, state, federal, and global levels help ensure that pathogen research is conducted ethically, safely, and securely by trained professionals at facilities that comply with strict physical containment provisions and policies. In May 2024, the White House Office of Science and Technology Policy issued extensive guidance addressing the oversight of dual use research of concern and pathogens with enhanced pandemic potential, which sets out an oversight framework for all federally funded research. We encourage Congress to allow and support implementation of these

¹ [Title V. Sec.538 \(4\)](#)

² [Title VII. Sec. 7058 \(d\) \(4\)](#)

oversight policies instead of instituting a blanket ban on funding for gain-of-function research.

Without the ability to conduct gain-of-function research, we run the risk that our military would not have access to vital research needed to address strategic biological warfare vulnerabilities, assess troop readiness, and complete threat assessments needed to protect against future adversarial action. In the past, robust American scientific research has been essential in developing vaccines, treatments, and protections against threats, such as with smallpox and anthrax. Combating current and future adversarial biological and pathogenic warfare will require research and experiments using gain-of-function techniques to understand how to address new threats and improve countermeasures. Banning gain-of-function research would leave U.S. service members unequipped and at risk of biological attacks.

We urge you not to include a prohibition on funding gain-of-function research in the final FY 2025 appropriations bills. We stand ready to work with you and your colleagues to ensure that we have a robust research oversight process for gain-of-function research without a loss to U.S. scientific leadership, military readiness, and public health. Thank you for your consideration of this request.

Sincerely,

American Institute of Biological Sciences
American Society for Biochemistry and Molecular Biology
American Society for Microbiology
American Society for Virology
Association of American Medical Colleges
Association of American Universities
Biophysical Society
Centivax, Inc.
Endocrine Society
Gerontological Society of America
Penn State University
Society for Healthcare Epidemiology of America
Stony Brook University
University of Wisconsin-Madison
Veterans for Common Sense