

**Testimony (Amended) of Lauren G. Gross, J.D., on behalf of
The American Association of Immunologists (AAI)**

**Submitted to the Senate Homeland Security and Governmental Affairs Committee
for the Hearing Record of January 14, 2014:
“Examining Conference and Travel Spending Across the Federal Government”**

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The American Association of Immunologists (AAI) (see <http://www.aai.org/>), the world's largest professional association of research scientists and physicians who are experts on the immune system, respectfully submits this testimony regarding federal spending on conferences and travel. AAI appreciates that the Committee is examining this important issue and has invited testimony from interested parties for submission into the hearing record of January 14, 2014 (“Examining Conference and Travel Spending Across the Federal Government”).

As a professional society, AAI holds an annual scientific meeting “which brings … together world leaders in immunology to present their research in lectures and … symposia. AAI also invites investigators at every career stage to submit abstracts reporting their latest scientific findings in oral and poster sessions.” (<http://www.aai.org/Meetings/index.html>) The AAI annual meeting is the largest annual scientific meeting in the world devoted solely to immunology; its size (more than 3,000 scientific attendees) and program breadth (more than 650 scientific lectures and talks, and over 1,700 poster presentations, on 22 topic areas) expose scientists not only to cutting edge advances in their own areas of expertise but also to areas beyond their subspecialties that could be important to their current work. The meeting also offers invaluable sessions devoted to scientific publication, career development, and government policies affecting biomedical research; and provides scientists at every stage and from all around the world with the opportunity to meet, exchange ideas, discuss existing or potential collaborations, and learn from one another.

As part of its educational mission, AAI also offers two, 6-day-long courses in immunology.

- The Introductory Course in Immunology, which will be held in Long Beach, California, in 2014, “is an intensive two-part course, taught by world-renowned immunologists, which provides a comprehensive overview of the basics of immunology.” (<http://www.aai.org/Education/Courses/index.html>)
- The Advanced Course in Immunology, which will be held in Boston, Massachusetts, in 2014, “is an intensive course directed toward advanced trainees and scientists who wish to expand or update their understanding of the field.” (<http://www.aai.org/Education/Courses/index.html>)

The AAI annual meeting and courses are open to all scientists, and scientists employed by the federal government - and particularly by the National Institutes of Health (NIH) - have historically participated fully in these activities, both as speakers and attendees. Recent policy changes within the federal government have threatened this important and ongoing participation. AAI is deeply concerned - on behalf of our members who are government employees and those who are not

but who collaborate, learn from, and depend on the scientific and program leadership of their government colleagues - that unless policy changes are implemented, the quality and value of our meetings and courses, and much more importantly, the advancement of our scientific discipline, will suffer real and irreparable harm.

Current federal policy

In May of 2012, the White House Office of Management and Budget (OMB) issued guidelines that mandated a 30% reduction (from 2010) in federal agency travel budgets. (*Office of Management and Budget Memorandum M-12-12 dated May 11, 2012*;

<http://www.whitehouse.gov/sites/default/files/omb/memoranda/2012/m-12-12.pdf>)

In response, each federal agency issued rules governing its own conference and travel spending. The Secretary of the Department of Health and Human Services (HHS) subsequently issued rules requiring, among other things, approval by the HHS Deputy Secretary of all travel to meetings where the “[t]otal expense by an individual OPDIV or STAFFDIV... [or the] [t]otal expense to HHS (for two or more OPDIVs and STAFFDIVs) ... [is] estimated [to be] in excess of \$75,000.”

(<http://www.hhs.gov/asfr/ogapa/acquisition/policies/appropriated-funds-use-for-conferences-meeting-space-6-24-2013.html>)

In the Omnibus Appropriations Acts of 2013 and 2014, Congress requires agencies to submit annual reports “regarding the costs and contracting procedures related to each conference held by any such department, agency, board, commission, or office during [the relevant] fiscal year ... for which the cost to the United States Government was more than \$100,000” and to comply with the “Office of Management and Budget Memorandum M-12-12 dated May 11, 2012.” See “Consolidated Appropriations Act, 2014,” Section 742 (<http://www.gpo.gov/fdsys/pkg/BILLS-113hr3547enr/pdf/BILLS-113hr3547enr.pdf>); and “Consolidated and Further Continuing Appropriations Act, 2013,” Section 3003 (<http://www.gpo.gov/fdsys/pkg/BILLS-113hr933enr/pdf/BILLS-113hr933enr.pdf>).

Impact of current federal policy on government scientists

AAI understands that these rules were promulgated in an effort to prevent excessive or unnecessary government spending and to prevent abuses, such as happened in recent scandals which were widely publicized. We support the prudent use of taxpayer funds and appreciate the apparent intent of the rules.

Nevertheless, AAI believes that, particularly in their implementation, the rules have had an unintended and deleterious effect; among other things (as described above), the rules have made government scientists feel cut off from the rest of the scientific community, wreaked havoc with their ability to fulfill professional commitments, and undermined the morale of some of the government’s finest minds. And importantly, the rules impede the opportunity for federal scientists to appear on podiums worldwide, demonstrating to taxpayers (and the international community) the value of U.S. government investment in biomedical research. It may be of concern to the Committee that at the AAI annual meeting in 2013, South Korea had more scientists in attendance than the United States federal government.

Scientists at the NIH must submit every request to travel to a meeting to NIH and HHS administrators. AAI understands that NIH scientists are even more frustrated with what they perceive as an inefficient system that requires requests be submitted many months in advance but are approved only at the last minute. AAI has been told that travel to our 2013 annual meeting (IMMUNOLOGY 2013™ in May 2013) was approved for some NIH staff and trainees less than 48 hours before the start of the meeting, causing massive disruption for those planning to attend and/or give presentations with a number of people canceling their trips. Many government scientists who are invited to speak at or attend a meeting that is only 3-4 months away decline the invitation because there is insufficient time to get approval to attend. This clearly undermines NIH's ability to fulfill its mission to share ongoing NIH research with the rest of the scientific community. In addition, at least one NIH institute has implemented a rule that requires each lab to pay for travel out of its own budget if the cost of travel is less than \$500.00, even if a sponsor is willing to cover the full cost. The institute apparently reasons that because it costs more than \$500.00 to process the paperwork, it is more cost-effective for each lab to pay the cost. However, we understand that this has negatively impacted the ability of scientists to travel since shrinking budgets have made labs and investigators less willing and able to absorb such costs.

Impact on interaction between federal government and its grantees

It is essential for program officers and other scientist-administrators at federal funding agencies to have the opportunity to meet and share information with existing and potential grantees. At scientific meetings and conferences, these federal leaders have formal and informal opportunities to discuss – and solicit input on – the scientific and policy agenda of their agency, and to learn about the needs of the stakeholders they serve. These interactions also assist government employees who are charged with overseeing federal research portfolios and expenditures. The current travel rules are impeding the ability of government employees to fulfill their mission.

Additional costs to federal government

There are significant additional costs to the government associated with the current travel policy of which the Committee should be aware:

1. Because agency approval to attend is required before a government scientist can register for a meeting, government scientists may not be able to take advantage of early registration discounts. For the AAI annual meeting, this is a significant cost: regular (non-graduate student) attendees who register about six weeks or more before the meeting save \$145.00 over the full registration cost; graduate student members who register early save \$75.00 (non-members save \$70.00).
2. Late approval to attend can also result in federal employees finding that hotels with the discounted rates that have been negotiated for a meeting have sold out, or that the less expensive hotel accommodations have already been booked. Unless federal employees awaiting travel approval make hotel reservations early, they may have no choice but to stay at hotels that are further away from the meeting site, more expensive, or both.
3. While government employees await approval for travel, airfares often increase. Although federal employees are eligible for government contract airfare, which is convenient, flexible, and fully refundable, it can be expensive. In an effort to preserve their limited budgets, some federal scientists try to purchase less expensive, non-refundable tickets. To purchase such a

ticket, the government requires that there be a significant cost savings (more than 40% for domestic and non-foreign fares and more than 15% for international fares) to the government. (See http://www.hhs.gov/travel/policies/2012_policy_manual.pdf) With the delay in approval, it is much harder for employees to find such savings; one federal scientist reports that his airfare increased, on more than one occasion, by over \$300.00 because of the delay and eventual rise in the cost of non-refundable fares.

Conclusion

AAI has been concerned about the federal travel policy and related legislation for some time, and has expressed this concern in letters to Congressional leaders and in testimony to the House and Senate Appropriations Subcommittees on Labor, Health and Human Services, Education, and Related Agencies (Labor-HHS), regarding the fiscal year (FY) 2013 and FY 2014 appropriations bills. On March 29, 2012, AAI said the following in testimony to the House Labor-HHS Appropriations Subcommittee:

“Government scientists are valued members of our organization and contribute significantly to scientific advancement in the field. It is as important to AAI to have them attend our meetings as it is for them to attend. Dialogue and information exchange among scientists from government, academia, industry and private institutes is absolutely essential, and any barriers to the participation of government scientists undermines [sic] the best interests of science.”
[\(http://aai.org/Public_Affairs/Docs/2012/AAI_FY2013_Roopenian_House_2012-03-29.pdf\)](http://aai.org/Public_Affairs/Docs/2012/AAI_FY2013_Roopenian_House_2012-03-29.pdf)

In conclusion, we urge the members of this Committee and of the Congress to work with the scientific community to ensure that federally employed scientists are permitted to participate fully in the collaborative and educational activities that advance the scientific enterprise. AAI thanks the Committee for its interest in this matter and for considering the views of AAI.