



AMERICAN ACADEMY OF
ORTHOPAEDIC SURGEONS

AMERICAN ASSOCIATION OF
ORTHOPAEDIC SURGEONS

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August 24, 2007

Jerry Moore
NIH Regulations Officer
Office of Management Assessment
National Institutes of Health (NIH)
6011 Executive Boulevard
Suite 601
MSC 7669
Rockville, MD 20892

Dear Mr. Moore:

The American Academy of Orthopaedic Surgeons (AAOS), representing over 19,000 Board certified orthopaedic surgeons and researchers, welcomes the opportunity to respond to the National Institutes of Health (NIH) request for comments for the notice of proposed rulemaking (NPRM) for multiple Principal Investigators RIN #0925-AA42.

As representatives of the orthopaedic community, we are supportive of the NIH and the NIH Roadmap for Medical Research. The AAOS responded to the Executive Office of the President's Office of Science and Technology Policy's (OSTP) Federal Register announcement NOT-OD-06-036 on September 16, 2005 expressing support for multiple Principal Investigators (PIs).

The AAOS understands that the measure is currently in practice at the NIH, and we are supportive of the efforts to finalize this regulation. The measure will ultimately benefit the orthopaedic community and facilitate grant and research opportunities between research institutions.

Additionally, the current request for comments includes two proposed changes:

- the proposed re-definition of the term Principal Investigator; and
- new language which will permit the Secretary to evaluate, approve, and make one or more awards for research grant applications.

The revision of the term "Principal Investigator," currently codified within the Code of Federal Regulations (CFR) Title 42, Part 52.2, is acceptable to the AAOS. The new language will clarify that one or more individuals may serve as the grant PI.

Proceeding as such will codify current practice at the NIH.

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Additionally, the AAOS concurs with the proposed recommendation to allow the Secretary to evaluate, approve, and make one or more awards pursuant to applications in the CFR Title 42, Part 52.6. Proceeding as such will allow the Secretary to issue more than one award if needed and consequently improve the scientific management of these projects.

The AAOS expresses appreciation for the opportunity to provide comments in this important process and looks forward to a continued partnership with the NIH. If you have any questions, please feel free to contact us or Christy M.P. Gilmour, AAOS Manager, Medical Research, Office of Government Relations, at 847-384-4323 or gilmour@aaos.org.

Sincerely,



Denis R. Clohisy, MD
Chair, AAOS Research Development Committee



Joshua J. Jacobs, MD
Chair, Council on Research, Quality Assessment, and Technology