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The Honorable Dr. Jay Bhattacharya  
Director  
National Institutes of Health  
9000 Rockville Pike  
Bethesda, MD 20892

Dear Director Bhattacharya,

President Trump's recent Executive Order (*Restoring Gold Standard Science*<sup>1</sup>) directs federal agencies to revert to the version of their scientific integrity (SI) policy that was in effect on January 19<sup>th</sup>, 2021—in many cases weakening or removing these policies as a result. It also calls for federal agencies to develop a new policy in line with the White House Office of Science and Technology Policy's (OSTP) Gold Standard Science agency guidance.<sup>2</sup>

OSTP Director Kratsios specifies on page one of the guidance on implementing the executive order: "Gold Standard Science represents a commitment to the highest standards of **scientific integrity**."<sup>3</sup> Towards this end, we at the Union of Concerned Scientists urge you to continue the implementation and protection of scientific integrity in the federal government in line with SI best practices.<sup>4,5,6</sup>

Federally-supported science has played a critical role in ensuring federal agencies can protect the health and well-being of people in America and worldwide. People rely on access to clean air and water, healthy food, safe medicine, uncontaminated products and materials, and early warnings and protection from extreme weather. Their access to these essentials will be compromised if scientific activities such as data collection, communication of results, or research funding are vulnerable to "bias or undue influence"<sup>7</sup> that the new OSTP guidance correctly identifies as a threat.

To continue protecting people and extending the benefits of science to everyone in our nation, the federal government must support the enforcement of scientific integrity policy and rely on independent science to inform policy decisions. Without strong federal science, people will suffer, especially historically marginalized communities.<sup>8</sup>

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<sup>1</sup> Trump, Donald J. 2025. "Restoring Gold Standard Science." Presidential Executive Order, May 23<sup>rd</sup>. Washington, DC: The White House. <https://www.whitehouse.gov/presidential-actions/2025/05/restoring-gold-standard-science/>

<sup>2</sup> Kratsios, M. J. 2025. "Agency Guidance for Implementing Gold Standard Science in the Conduct & Management of Scientific Activities." Memorandum for the Heads of Executive Departments and Agencies, June 23. Washington, DC: Office of Science and Technology Policy.

<sup>3</sup> Kratsios, M. J. 2025. "Agency Guidance for Implementing Gold Standard Science in the Conduct & Management of Scientific Activities." Memorandum for the Heads of Executive Departments and Agencies, June 23. Washington, DC: Office of Science and Technology Policy.

<sup>4</sup> MacKinney, Taryn, Carter, Jacob, Reed, Genna, Goldman, Gretchen, and Desikan, Anita. August 25<sup>th</sup>, 2020. *A Roadmap for Science in Decisionmaking*. Cambridge, MA: Union of Concerned Scientists. <https://www.ucs.org/resources/roadmap-science-decisionmaking>

<sup>5</sup> Scientific Integrity Framework Interagency Working Group. January 2023. *A Framework for Federal Scientific Integrity Policy and Practice*. Washington, DC: US National Science and Technology Council.

<sup>6</sup> White House Office of Science and Technology Policy (OSTP). May 2023. *Scientific Integrity Policy*. Washington, DC: US OSTP.

<sup>7</sup> Kratsios, M. J. 2025. "Agency Guidance for Implementing Gold Standard Science in the Conduct & Management of Scientific Activities." Memorandum for the Heads of Executive Departments and Agencies, June 23. Washington, DC: Office of Science and Technology Policy.

<sup>8</sup> Union of Concerned Scientists. September 2<sup>nd</sup>, 2016. *Science and Racial Equity*. Cambridge, MA. <https://www.ucsusa.org/resources/science-and-racial-equity>

The best available science on what makes a strong, effective SI policy is the result of the tireless efforts of scientific integrity experts within<sup>9</sup><sup>10</sup> and outside<sup>11</sup> of the federal government. SI best practices outline seven key criteria to be included in SI agency policies:

**1. Defend Independent Science:**

The best available science<sup>12</sup> is used to inform agency decision-making, and any effort to interfere in data collection, analysis, or research funding is halted and held to account. This ensures the critical decisions and policies of federal agencies are informed by the “most reliable, valid, up-to-date, and relevant, empirical knowledge”<sup>13</sup> and are “free from financial, personal, or institutional influences.”<sup>14</sup>

**2. Avoid Conflicts of Interest:**

Conflicts of interest include “financial, personal, or institutional influences that could bias outcomes or undermine objectivity.”<sup>15</sup> Any potential conflict of interest is communicated with transparency to the public and accounted for in agency policy and decisions.

**3. Institute Apolitical Oversight:**

Independent, apolitical career staffers oversee the enforcement of scientific integrity policies and are responsible for resolving potential violations.

**4. Facilitate Open Communication:**

Federal scientists and workers can communicate their research and results without fear of political interference, intimidation, or retribution. Research activities including data collection, methodology, and analysis are transparently communicated to the public without compromising data privacy and personally identifiable information.

**5. Ensure Accountability:**

The process of reporting and resolving violations of scientific integrity is clear and enforceable.

**6. Protect Federal Workers:**

Federal scientists and those supported by federal funding who report and speak out about conflicts of interest, undue influence, or political overreach are aware of their rights and protected from retribution.

**7. Normalize Scientific Integrity Practices:**

These principles are openly encouraged by agency leadership, who present regular opportunities for federal workers to develop their scientific integrity expertise, discuss topics of scientific integrity, and safely share scientific integrity concerns.

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<sup>9</sup> Scientific Integrity Framework Interagency Working Group. January 2023. A Framework for Federal Scientific Integrity Policy and Practice. Washington, DC: US National Science and Technology Council.

<sup>10</sup> White House Office of Science and Technology Policy (OSTP). May 2023. Scientific Integrity Policy. Washington, DC: US OSTP.

<sup>11</sup> MacKinney, Taryn, Carter, Jacob, Reed, Genna, Goldman, Gretchen, and Desikan, Anita. August 25<sup>th</sup>, 2020. *A Roadmap for Science in Decisionmaking*. Cambridge, MA: Union of Concerned Scientists. <https://www.ucs.org/resources/roadmap-science-decisionmaking>

<sup>12</sup> Phillips, C. 2025. “What Does the “Best Available Science” Mean?” *The Equation* (blog). January 15<sup>th</sup>. <https://blog.ucsusa.org/carly-phillips/what-does-best-available-science-mean/>

<sup>13</sup> Phillips, C. 2025. “What Does the “Best Available Science” Mean?” *The Equation* (blog). January 15<sup>th</sup>. <https://blog.ucsusa.org/carly-phillips/what-does-best-available-science-mean/>

<sup>14</sup> Kratsios, M. J. 2025. “Agency Guidance for Implementing Gold Standard Science in the Conduct & Management of Scientific Activities.” Memorandum for the Heads of Executive Departments and Agencies, June 23. Washington, DC: Office of Science and Technology Policy.

<sup>15</sup> Kratsios, M. J. 2025. “Agency Guidance for Implementing Gold Standard Science in the Conduct & Management of Scientific Activities.” Memorandum for the Heads of Executive Departments and Agencies, June 23. Washington, DC: Office of Science and Technology Policy.

Just as Director Kratsios encourages “a commitment to the highest standards of scientific integrity,”<sup>16</sup> we urge agency leadership to continue the implementation of these scientific integrity protections. Protecting independent science can help facilitate economic,<sup>17</sup><sup>18</sup> public, and environmental health. Agency scientists should be able to rely on the best available science and scientific practices and give political decision-makers the best information possible, for the benefit of our nation's health and well-being.

Thank you for your time and we look forward to your response on this matter.

Sincerely,

Union of Concerned Scientists

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<sup>16</sup> Kratsios, M. J. 2025. “Agency Guidance for Implementing Gold Standard Science in the Conduct & Management of Scientific Activities.” Memorandum for the Heads of Executive Departments and Agencies, June 23. Washington, DC: Office of Science and Technology Policy.

<sup>17</sup> Rosenberg, A. A., Branscomb, L. M., Eady, V. Frumhoff, P. C. Goldman, G. T., Halpern, M., Kimmell, K., Kothari, Y., Kramer, L. D., Lane, N. F., McCarthy, J. J., Phartiyal, P., Rest, K., Sims, R., and Wexler, C. 2015. “Congress’s Attacks on Science-Based Rules.” *Science*, 348(6238), 964-966. <https://doi.org/10.1126/science.aab2939>

<sup>18</sup> United for Medical Research. 2025. *NIH's Role in Sustaining the U.S. Economy: 2025 Update*. Washington, DC. <https://www.unitedformedicalresearch.org/annual-economic-report/>