



Posted on May 11 2009

**Public Comment Welcomed on Draft NIH Guidelines for Embryonic Stem
Cell Research Until May 26 2009
Let Your Voice Be Heard!**

On August 9 2001, former President George W. Bush wrote an executive order restricting federal funding on human embryonic stem cell lines derived before that date. On March 9 2009, President Barack Obama wrote an executive order lifting those restrictions. Obama's order did not give any details on the source of the embryos eligible for federal funding, but left that decision to the National Institutes of Health (NIH). On April 24 2009, the NIH posted the draft guidelines for human stem cell research.

These draft guidelines will allow funding for research using human embryonic stem cells derived from embryos created by in vitro fertilization (IVF) for reproductive purposes, but no longer needed for that purpose. Acting NIH Director, Raynard Kington expects that in a matter of months there will be a great increase in the number of human embryonic stem cell lines eligible for federal funding. Literature reviews suggest that there are up to 700 lines in existence right now. These guidelines also describe in some detail informed consent procedures required for the derivation of embryonic stem cells to be funded by the NIH.

NIH funding for embryonic stem cells derived from other sources such as cloning and/or embryos created for research purposes only is strictly prohibited. The NIH will not fund any kind of human embryo research which is prohibited by the annual appropriations ban known as the Dickey-Wicker Amendment.

The NIH welcomes public comment on these draft guidelines until May 26 2009. Comments may be mailed to: NIH Stem Cell Guidelines, MSC 7997, 9000 Rockville Pike, Bethesda, MD, 20892-7997. Comments can also be submitted online at: [http://nihoerextra.nih.gov/stem cells/add.htm](http://nihoerextra.nih.gov/stem%20cells/add.htm). The official guidelines will be issued on July 7 2009.

Because our tax dollars will soon be used to fund human embryonic stem cell research, we believe it is critical for every American to let their voice be heard.

This is indeed a rare opportunity when the government actually invites and takes seriously the views of those who care about this issue. There are several areas which still need to be addressed with regard to how this research will take place and what limits will ultimately be placed on it. Therefore, we suggest the public consider the following issues for comment:

1) While we do not agree with the morality of embryonic stem cell research, we applaud the NIH's efforts to avoid the more controversial sources of embryos and encourage the NIH to continue to restrict federal funding on embryonic stem cells derived from other sources such as cloning.

2) Implore Congress to continue to renew the Dickey-Wicker Amendment which prevents the NIH from funding the derivation of stem cells from human embryos and from creating human embryos for research purposes only.

3) If the Dickey-Wicker Amendment is ever overturned, the Office of Human Research Protection should provide guidance on this issue. Right now, the Office of Human Research Protection does not include embryonic stem cell research under its umbrella of protection because such research does not fit the narrow definition of human subject research.

4) Insist that the guidelines be made even more stringent by limiting federal dollars to embryonic stem cells created to date (Spring 2009). This can provide a safeguard against an industry that wants to continue to funnel federal dollars solely into embryonic stem cell research.

5) There should be a database created for consent forms/institutional policies used for each cell line. This can provide a way for greater accountability on the part of the researchers.

6) There should be a serious public discussion concerning how to make a clear separation between the clinician in the IVF clinic and the researcher in the laboratory. This separation may possibly reduce the amount of pressure couples will undoubtedly experience to donate excess embryos for research.

7) There should be an explicit ban against using federal dollars to produce *totipotent* organisms from NIH approved embryonic stem cell lines. It is widely established scientifically that there are plenty of *totipotent cells* (that is, cells that are "totally" potent and capable of regulating themselves to become a complete human being) still present in 5-7 day old embryos (or blastocysts). Creating embryos from these totipotent cells should be strictly and explicitly prohibited.