



February 22, 2019

William T. Riley, Ph.D.  
Director  
Office of Behavioral and Social Sciences Research  
Office of the Director  
National Institutes of Health  
31 Center Drive, Building 31, Room B1C19  
Bethesda, MD 20892

Re: NOT-OD-19-032

Dear Dr. Riley:

Thank you for the opportunity to provide input into the development of a new NIH definition of “behavioral and social sciences research.” On behalf of the Consortium of Social Science Associations (COSSA), I submit the enclosed comments to the draft definition released on January 14, 2019.

First, COSSA would like to thank OBSSR for leading the effort to set a definition that not only seeks to accurately represent the many ways BSSR informs our understanding of health—which by itself is vitally important—but also communicates the centrality of behavioral and social science research to NIH’s broader mission of using knowledge to “enhance health, lengthen life, and reduce illness and disability.” This is not a simple task, so we thank you for your efforts and hope you find the following recommendations constructive and helpful toward meeting these goals.

## I. GENERAL COMMENTS

**RECOMMENDATION:** Clarify and/or differentiate the formal BSSR definition from supplementary and illustrative language.

It is not clear whether all the language included in the draft definition as presented in the RFI is intended as the formal definition of BSSR or if some of the language is explanatory or illustrative of potential research topics and activities of particular interest to the agency.

The best outcome of this exercise would be a definition of “behavioral and social sciences research” that is concise and complete, while also representative of the diverse fields, questions, methods, and tools used by behavioral and social science researchers. To this end, we recommend separating (or being more explicit if this is already the intent) the formal BSSR definition from language that is “explanatory” or “illustrative.”

Differentiating the parts of the definition in this way may have an added benefit of providing flexibility for when the explanatory language needs updating due to advancements and new frontiers in behavioral and

social science research or changing agency priorities. Arguably, NIH could more easily revise explanatory language to more accurately reflect the agency's current interests than the formal BSSR definition.

Our remaining comments offer specific language revisions following a structure that includes a "formal definition" and supplementary "explanatory language."

## II. LANGUAGE REVISIONS

**RECOMMENDATION:** COSSA proposes the following revisions to the formal BSSR definition:

1. The term "processes" in the first sentence of the revised definition is too narrow to represent the full suite of behavioral and social phenomena that impact health. Processes are important, but the definition should not be so narrow as to omit statuses and structures (e.g., are educational attainment or family structure considered "processes" or "behaviors?").

**SUGGESTED REVISION:** Combine the first two sentences of the draft revised definition to read:

*Behavioral and social sciences research (BSSR) at the NIH relies on a multi-disciplinary and interdisciplinary set of research fields and disciplines that have in common the systematic study of behavioral and social phenomena, including their causes and consequences.*

2. Similar to our above comments, the definition of "social" in the bulleted section of the revised definition is too narrow. Here too it is important to ensure that the definition includes structures, statuses, and broader contexts.

**SUGGESTED REVISION:** Revise the definition of "social" to read:

*"Social" refers to the interactions between and among individuals; the activities and/or structures of social groups, institutions, and environments, including family, community, school, workplace, economic, cultural, linguistic, and policy environments; and statuses that define the individual in relation to societal groups, institutions, and environments (e.g., minority status, language, occupation, and residence).*

Taking the above edits together, **the formal definition of BSSR would read:**

*Behavioral and social sciences research (BSSR) at the NIH relies on a multi-disciplinary and interdisciplinary set of research fields and disciplines that have in common the systematic study of behavioral and social phenomena, including their causes and consequences."*

- *"Behavioral" refers to overt or observable actions and to mental phenomena such as knowledge, attitudes, beliefs, cognitions, and emotions that are inferred from behavior.*
- *"Social" refers to the interactions between and among individuals; the activities and/or structures of social groups, institutions, and environments, including family, community, school, workplace, economic, cultural, linguistic, and policy environments; and statuses that define the individual in relation to societal groups, institutions, and environments (e.g., minority status, language, occupation, and residence).*

**RECOMMENDATION:** COSSA proposes the following revisions to the supplementary language accompanying the formal definition:

1. To clarify that this language is *not* part of the formal definition, the section should begin with something to the effect of “OBSSR [or NIH] encourages researchers to study...”
2. Regarding the final paragraph discussing monitoring of BSSR at NIH, COSSA suggests NIH use as its criteria projects for which it is clear that a behavioral or social variable is a focal independent or dependent variable. This, we think, will guard against incorrectly counting projects as BSSR that may control for some SES measure without it being a focus.

To this effect, COSSA suggests the following revision to the final paragraph:

*For the purposes of monitoring the behavioral and social sciences at the NIH, a project (grant application, funded grant, contract, etc.) is considered BSSR if one of the dependent variables or an independent variable of focal concern to the project (as represented in the abstract) is a “behavioral” or “social” phenomena as defined above. Behavioral or social moderator or mediator variables also may be sufficient for a project to be classified as BSSR if these variables are central to study hypotheses.*

Thank you again for this opportunity to comment and for your work on this important activity. Please do not hesitate to contact me with any questions.

Sincerely,



Wendy A. Naus  
Executive Director  
Consortium of Social Science Associations