

March 1, 2007

**TO:** Interested Parties

**FROM:** Rachel Laser, Director of the Culture Project; Michael Earls, Policy Advisor

**SUBJECT:** **The Responsible Path Forward on Stem Cell Research**—Supporting  
*The Stem Cell Research Enhancement Act* While Avoiding the Traps

This memo is about persuading moderate Americans to support the *Stem Cell Research Enhancement Act*. At first glance, public support for stem cell research seems both broad and deep.<sup>1</sup> And yet, in Missouri, where the issue was on the ballot in 2006, the measure passed by just 51–49%—despite proponents outspending the opposition by nearly \$30 million.<sup>2</sup>

We do not believe that all of the opposition is due to concerns about the destruction of embryos or “culture of life” arguments pegged to the abortion debate. Rather, as this memo explains, many who oppose stem cell research feel a lingering unease about the advancement of science because of concerns that it will proceed unchecked. We offer guidelines to address the concerns of those we call the *stem cell grays*.<sup>3</sup>

## Where Americans Stand on the Stem Cell Debate

On stem cells, the public falls into three broad categories. One group has a general faith in science and confidence in the progress that science brings to the world. They do not see the use of an embryo as a major ethical dilemma. They are firmly in support of stem cell research like that in the *Stem Cell Research Enhancement Act*, and they need no persuading.

A second group has little faith in science and often sees it as amoral, dangerous, and a threat to their belief systems. They tend to place a maximum “life value” on the human embryo. This group is firmly and unalterably opposed to stem cell research.

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<sup>1</sup> Recent poll results include 56% support in a December 2006 [Associated Press/AOL News](#) poll, 50% support (against 37% disapproval) in a [Newsweek](#) October 2006 poll, 56% support in a Pew Research July 2006 poll, 68% support in a July 2006 NBC News/[Wall Street Journal](#) poll in July 2006, and 67% support in a Genetics and Public Policy Center October 2005 poll. The fluctuation in numbers is most likely due to the various ways polls phrased their questions.

<sup>2</sup> Jake Wagman. “McCaskill Prevailed Despite Cash Gap.” *St. Louis Post-Dispatch*. December 9, 2006.

<sup>3</sup> There is also much to be learned from California’s experience with their current stem cell research policy. Please see the Appendix from the Center for Genetics and Society (CGS), *Federal Stem Cell Policy: Lessons Learned from California*.

The third group believes in science, but they are worried that there is no ethical or moral “braking mechanism” on research and advancements. They understand the potential benefits of stem cell research, but they worry that we are going to cross a line and interfere irresponsibly with nature’s creation. **This group—which we call the “stem cell grays”—is persuadable with a message that carefully balances ethics with progress. In a phrase: *The Stem Cell Research Enhancement Act is the responsible path forward.***

## Winning the Stem Cell Debate

### 1. Assuage the concern of stem cell grays that science will advance without moral safeguards.

For too long, the debate over stem cell research has been dominated by the advocates on both sides, neither of whom address the core concerns of the stem cell grays. The most impassioned opponents of the research focus on the destruction of embryos, and they equate stem cell research with abortion. This “culture of life” argument rings hollow for many in the middle.

But proponents of stem cell research also are missing the mark with stem cell grays. Pro-research advocates usually emphasize the immense scientific potential of stem cells and focus on “cures”. For example, when California passed its stem cell ballot initiative, proponents ran what they called a “Countdown for Cures” campaign and made promises that were deeply disquieting to those who worry about science rushing forward ahead of ethics.

Another of the proponents’ arguments, that we are in a “race” against other countries for cures, also is at cross-purposes with reaching the *stem cell grays*. Indeed, it is this race that they are worried about—an unbridled sprint forward with little regard for nature’s creation. A Virginia Commonwealth University (VCU) poll found that 56% of Americans believe that science does not pay enough attention to moral values.<sup>4</sup> The majority of VCU respondents (51%) also believe that “scientific research has created as many problems for society as solutions.”<sup>5</sup> By a margin of 54–41%, Americans believe that altering genetic characteristics to reduce a newborn’s chance of a serious disease is “taking medical advances too far.”<sup>6</sup>

This concern could become even more pronounced in the context of somatic cell nuclear transfer (SCNT) research, which relies on cloning techniques and raises the

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<sup>4</sup> Virginia Commonwealth University, VCU Center for Public Policy, Survey, and Evaluation Research Laboratory. “2006 VCU Life Sciences Survey.” December 2006. [http://www.vcu.edu/lifesci/images2/life\\_survey\\_2006\\_report.pdf](http://www.vcu.edu/lifesci/images2/life_survey_2006_report.pdf).

<sup>5</sup> 2006 VCU Life Sciences Survey; see also Noam Schieber, *Stem Cell Research Isn’t a Wedge Issue*, *The New Republic* (July 2006).

<sup>6</sup> Virginia Commonwealth University, VCU Center for Public Policy. “2003 VCU Life Sciences Survey.” September 2003. <http://www.vcu.edu/lifesci/images2/survey2003.pdf>.

specter of human cloning.<sup>7</sup> VCU reports that 79% of Americans are opposed to human cloning, 57% are opposed to using cloning technology for therapeutic purposes, and 51% are opposed to cloning technology used for medical research.<sup>8</sup>

Therefore, rather than focusing only on the scientific promise of stem cell research, supporters of the *Stem Cell Research Enhancement Act* should also highlight the bill's ethical safeguards, including requirements that forbid financial inducements for donated embryos, mandate informed and written consent for the donation, and require HHS and NIH to produce guidelines.

## **2. Note that the *Stem Cell Research Enhancement Act* finds the most ethical use for embryos that would otherwise be discarded.**

By a 56–30% margin, voters say the potential medical progress from stem cell research outweighs their moral concerns about destroying the embryo.<sup>9</sup> But 68% of Americans confer a moral status to the human embryo.<sup>10</sup>

Stem cell proponents must explain that the *Stem Cell Research Enhancement Act* makes the *most ethical* use of excess embryos as compared to the alternative—destruction (the bill requires that all embryos used would otherwise have been marked for destruction). It still allows donors to give up their excess embryos for “adoption” or to keep their embryos frozen—just like now. But instead of relegating the remaining embryos to destruction down a sink, it allows donors to give up their excess embryos for potentially life-saving research.

## **The Winning Message on Stem Cells**

***The Stem Cell Research Enhancement Act is the responsible path forward on stem cells. It allows for a potentially life-saving avenue of research, and it places an important moral compass on the scientific community to guard against the possibility of abuse and unethical behavior. The bill is ethical, moral, and humane, and with these appropriate safeguards in place, we owe it to the world to move ahead and open this great new medical frontier.***

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<sup>7</sup> This technique seeks to combine the nucleus of a somatic cell and a woman's donated egg from which the nucleus has been removed, to produce a cloned embryo.

<sup>8</sup> VCU 2006 poll.

<sup>9</sup> A Pew Research Center, July 2006 poll asked: "Which is more important: conducting stem cell research that might result in new medical cures or not destroying the potential life of human embryos?"

<sup>10</sup> Genetics and Public Policy Center, "Values in Conflict: Public Attitudes on Embryonic Stem Cell Research." October 2005. [http://www.dnapolicy.org/pub.reports.php?action=detail&report\\_id=1](http://www.dnapolicy.org/pub.reports.php?action=detail&report_id=1). Among this poll's respondents, 14.5% accorded "moderate" moral status, 25.7% accorded "high" moral status, and 27.7% accorded "maximum" moral status to an embryo.

# Appendix

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## Federal Stem Cell Policy: Lessons from California

Stem cell politics are set for a replay. Congress is braced to vote again to loosen the administration's restrictions on federal funding; the President is expected again to veto the bill; and there are not enough votes for an override.

As public attention turns to reconsider embryonic stem cell research, it is important for supporters of expanding federal funding to also promote careful regulation and oversight. The *Stem Cell Research Enhancement Act* is a real step forward, but we will need additional policies and a thoughtful approach if the benefits of hoped-for technical advances are to be realized, and a range of potential problems avoided.<sup>i</sup>

### The California experience

The difficulties encountered by the California stem cell program are instructive. In November 2004, California voters passed a hotly contested stem cell ballot initiative. The measure allocated \$3 billion in taxpayer-financed bonds to support stem cell research, and established the California Institute for Regenerative Medicine (CIRM)<sup>ii</sup> to award grants and administer the program.

Though the initiative passed 59% to 41%, CIRM began encountering political difficulties immediately after the election.<sup>iii</sup> The agency has been criticized on a range of issues – including lack of transparency and accountability, conflicts of interest, an uncooperative stance toward state legislators, and irresponsible rhetoric – by progressive California organizations that support embryonic stem cell research,<sup>iv</sup> by the editorial boards of major state newspapers that backed the stem cell initiative,<sup>v</sup> and by an early legislative champion of embryonic stem cell research, Democratic State Senator Deborah Ortiz.<sup>vi</sup>

The Center for Genetics and Society (CGS) is an Oakland, California-based non-profit organization working for responsible uses and effective governance of human biotechnologies.<sup>vii</sup> CGS supports public funding of embryonic stem cell research, but we were not able to support the stem cell initiative because of its many flaws. Since its passage, we have been in the forefront of progressive efforts for greater accountability and more attention to the public interest in the state's stem cell program, for a more nuanced public understanding of the social issues raised by stem cell research.

CGS staff are widely recognized as experts in stem cell policy and have been quoted in scores of news accounts. We have submitted many suggestions to CIRM, a

number of which the agency has accepted; testified at state legislative hearings; and worked closely with Senator Ortiz on a recently passed bill to safeguard women who provide eggs for research.<sup>viii</sup>

Both the California initiative and the *Stem Cell Research Enhancement Act* involve public funding of stem cell research. Unlike the *Stem Cell Research Enhancement Act*, which applies to research using embryos created but not needed for fertility purposes, the California initiative prioritized research on embryos created with the cloning technique known as somatic cell nuclear transfer (SCNT). A number of progressive concerns about stem cell policy are relevant to SCNT, and thus are not immediately raised by the current federal bill. But supporters of embryonic stem cell research need to understand the implications of the entire field in order to proceed responsibly, both in terms of policy and politics. Further, federal bills addressing SCNT have been introduced in the past and are likely to be re-introduced in the near future.

Here are key lessons learned from the California experience:

1. **Avoid exaggerated promises of cures** and inflated claims about the imminence and likelihood of breakthroughs.

Supporters of embryonic stem cell research can communicate our hopes for medical and scientific advances without the irresponsible rhetoric that has become all too common. The campaign for the California stem cell initiative promoted a “Countdown for Cures” and produced ads that made scientifically irresponsible promises. Before long, researchers found themselves having to dampen the unrealistic expectations and hopes they had helped raise. When CIRM acknowledged in its 10-year strategic plan that there will likely be no cures during the decade of the program’s existence, embarrassing headlines ensued.<sup>ix</sup>

As Princeton University president and geneticist Shirley Tilghman put it shortly after the stem cell initiative passed, “Some of the public pronouncements in the field of stem cell research come close to over-promising at best and delusional fantasizing at worst. In either case, such pronouncements do not serve the long-term goal of developing effective treatment for diseases.”<sup>x</sup>

To the extent that policy and public discussions of stem cell research include SCNT, an even more cautious approach is needed. Though SCNT may turn out to be useful as a research tool, more and more researchers acknowledge that futuristic scenarios of “personal biological repair kits” based on this technique are improbable.<sup>xi</sup>

Supporters of embryonic stem cell research should also avoid unsubstantiated projections about economic benefits and projected savings in health care costs.<sup>xii</sup>

2. **Talk about the regulatory process as a critical part of ensuring ethical oversight.**

Although stem cell and cloning research entail both familiar and novel regulatory challenges, effective federal regulation and oversight have not yet been established.<sup>xiii</sup> The *Stem Cell Research Enhancement Act* is not a vehicle for regulatory oversight, but the public and political discussions it prompts should emphasize the need for federal agencies to quickly establish responsible policies.

The California experience provides cautionary lessons about regulation and

oversight. The initiative exempts the activities of CIRM from “current and future state regulations and laws,” and insulates the agency from legislative oversight, and efforts by state legislators to work cooperatively with CIRM were repeatedly rebuffed.<sup>xiv</sup> These policies and practices have prompted criticism that could easily have been avoided.

CIRM has also been much criticized for the conflicts of interest built into its structure: Every member of its governing board represents an institution or constituency likely to seek a share of the \$3 billion of public funds it controls. Conflicts of interests on the part of individual members of the board have also been revealed.<sup>xv</sup> Principles of good governance, along with practices in other countries with research programs, suggest the benefit of including a broad range of stakeholder voices and perspectives on boards and committees involved with stem cell research, and of drawing clear lines disallowing conflicts of interest.

**3. Acknowledge concerns raised by proposals to use cloning techniques, especially health risks to women who provide eggs for research.**

The California stem cell initiative (like the Missouri measure in the 2006 election cycle) prioritizes SCNT, which requires large numbers of women’s eggs. People across the political spectrum are increasingly concerned about researchers asking young women to undergo egg retrieval procedures that pose significant risks, and to do so for benefits that are speculative in nature.<sup>xvi</sup>

California progressives have had significant policy success on this issue. CGS, along with other women’s health and public interest organizations, helped convinced CIRM to adopt policies that provide some level of protection for women undergoing egg retrieval for research, and worked closely with Senator Ortiz on a bill with similar safeguards for investigations funded by sources other than CIRM.<sup>xvii</sup> These policies can serve as models for other states and for federal agencies.

It is also important to support mechanisms to prevent the misappropriation of cloned embryos for rogue efforts to produce cloned children, a widespread public concern.<sup>xviii</sup>

**4. Prioritize research most likely to produce treatments that are widely affordable.**

The California stem cell debate has included questions about the affordability of any medical products that the research may produce, and about the prospects for what one progressive organization terms “fair cures.”<sup>xix</sup>

These questions are particularly salient in California because voters approved a direct investment of scarce public funds, but similar questions are likely to surface elsewhere. Policies related to patents and other intellectual property, to technology transfer arrangements at public universities, and to guarantees of affordable pricing have all been discussed. Widespread concerns about drug prices, pharmaceutical industry scandals, and regulatory failures could amplify concerns about whether treatments based on stem cell research will be priced beyond the means of most people.

## Endnotes

<sup>i</sup> For an overview, see *The Basics: Stem Cells and Public Policy*, authored by the Center for Genetics and Society and published by The Century Foundation, <http://www.tcf.org/list.asp?type=PB&pubid=566>

<sup>ii</sup> California Institute for Regenerative Medicine, <http://www.cirm.ca.gov/>

<sup>iii</sup> For a blog devoted to CIRM, see *The California Stem Cell Report*, published by David Jensen, a former Sacramento political reporter and prize-winning editor, and press aide to former California Governor Jerry Brown, <http://californiastemcellreport.blogspot.com/>

<sup>iv</sup> Before and immediately after the passage of the stem cell initiative, progressive critics included the **Center for Genetics and Society**, <http://www.genetics-and-society.org/index.asp>, a public interest organization based in Oakland, California that works to establish responsible research and governance of human biotechnologies; the 65,000-member **California Nurses Association**, <http://www.calnurse.org/>; the **Pro-Choice Alliance for Responsible Research**, an ad hoc network of women's health and reproductive rights advocates formed during the campaign; and **Californians Aware**, <https://www.calaware.org/home.php>, a public-interest organization "that works to support and defend open government, an enquiring press and a citizenry free to exchange facts and opinions on public issues." During 2005 and 2006, the **Greenlining Institute**, <http://www.greenlining.org/index.php>, a multi-ethnic public policy, research and advocacy institute, drew attention to the need to ensure the affordability of any successfully developed stem cell treatments; and the **Foundation for Taxpayer and Consumer Rights**, <http://www.consumerwatchdog.org/>, became active on patent and intellectual property issues, urging CIRM to adopt policies that would return to the public a share of any profits realized from the public investment.

<sup>v</sup> A small sample of editorials from the state's major newspapers: "Stem cell integrity: Agency with bucks still has some blinders," *Sacramento Bee*, Dec. 6, 2006, <http://www.sacbee.com/110/story/88079.html>; "Promises to keep," *Los Angeles Times*, January 17, 2006, <http://www.genetics-and-society.org/newsdisp.asp?id=923>; "Stem cell follies: Crank up the spin machine," *Sacramento Bee*, July 17, 2005, <http://www.genetics-and-society.org/newsdisp.asp?id=814>; "Rogue operator: Stem cell czar hires lobbyist, skirts board on key issues," *Sacramento Bee*, May 22, 2005, <http://dwb.sacbee.com/content/opinion/story/12929251p-13777037c.html>; "Stop fighting curbs on favoritism: For research effort to succeed, taxpayers must trust how \$3 billion is handed out," *San Jose Mercury News*, May 5, 2005, <http://www.genetics-and-society.org/newsdisp.asp?id=766>;

"Stem-cell glitches," *San Francisco Chronicle*, January 5, 2005, <http://www.genetics-and-society.org/newsdisp.asp?id=691>

<sup>vi</sup> Senator Ortiz, who was term-limited out of office in 2006, campaigned for the stem cell initiative but began working on what she called its "flaws" within weeks of the election. See her op-ed, "Public accountability is key to California's stem-cell research," *San Francisco Chronicle*, December 27, 2004, <http://www.genetics-and-society.org/newsdisp.asp?id=689>. Sen. Ortiz went on to introduce legislation that would have provided greater oversight for CIRM, which was approved 28-0 in the Senate and 72-2 in the Assembly but vetoed by Governor Arnold Schwarzenegger ("Stem cell measure vetoed," *San Francisco Chronicle*, October 1, 2005, <http://www.genetics-and-society.org/newsdisp.asp?id=848>), and a bill to safeguard women who provide eggs for stem cell research which passed both chambers with nearly unanimous votes and was signed into law by Governor Schwarzenegger in September 2006 ("Press Statement: California Enacts Law to Reduce Risks to Women Who Provide Eggs For Stem Cell Research," Center for Genetics and Society, September 26, 2006, [http://www.genetics-and-society.org/resources/cgs/20060926\\_eggs\\_press.html](http://www.genetics-and-society.org/resources/cgs/20060926_eggs_press.html)).

<sup>vii</sup> See the Center for Genetics and Society, <http://www.genetics-and-society.org>

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<sup>viii</sup> The bill to safeguard egg donors was supported by the Center for Genetics and Society, the Pro-Choice Alliance for Responsible Research, Planned Parenthood Affiliates of California, and the Women's Foundation of California. See "California Victory: Standards and Safeguards on Eggs for Research," *Genetic Crossroads*, October 20, 2006, <http://www.genetics-and-society.org/newsletter/archive/20061020.html>, and "A Pro-Woman Stem-Cell Policy," Marcy Darnovsky, *TomPaine.com*, October 26, 2006, [http://www.tompaine.com/articles/2006/10/26/a\\_prowoman\\_stemcell\\_policy.php](http://www.tompaine.com/articles/2006/10/26/a_prowoman_stemcell_policy.php)

<sup>ix</sup> "Reality check for stem cell optimism," Mary Engel, *Los Angeles Times*, December 3, 2006, <http://www.latimes.com/news/local/la-me-stemcell3dec03.1,707176.story?coll=la-headlines-california>.

The CIRM strategic plan can be viewed at [http://www.cirm.ca.gov/meetings/pdf/2006/12/120706\\_item\\_7.pdf](http://www.cirm.ca.gov/meetings/pdf/2006/12/120706_item_7.pdf)

<sup>x</sup> "Address to the Stem Cell Institute of New Jersey," President Shirley M. Tilghman, November 11, 2004, <http://www.princeton.edu/president/speeches/20041111/index.xml>

<sup>xi</sup> At the 2004 Democratic National Convention, Ron Reagan Jr. spoke of the "personal biological repair kit[s] standing by at the hospital" that he believed research cloning would make possible. See a transcript of his speech at <http://politicalgateway.com/news/read.html?id=535>

<sup>xii</sup> CIRM leadership has been criticized for misleading the public about the cost of the program to taxpayers and about whether financial returns would be shared with the state. According to news reports in 2005, Robert Klein, the author of the stem cell initiative who played a key role in the campaign and became Chair of CIRM's governing board, apparently knew from the beginning that the initiative would never pay for itself, or even generate a surplus for the state, as both he himself and other advocates repeatedly claimed. Senator Ortiz played a key role in widening the discussion of the CIRM's intellectual property policies, and proposed reforms that included requirements for both financial returns to the state and affordable pricing. See "Stem cell royalty promise just election ruse?," Stuart Leavenworth, *Sacramento Bee*, November 7, 2005, <http://dwb.sacbee.com/content/opinion/story/13826776p-14667506c.html> and "Tax law casts doubt on stem cell royalties," Bernadette Tansey, *San Francisco Chronicle*, October 25, 2005, <http://www.sfgate.com/cgi-bin/article.cgi?file=/c/a/2005/10/25/MNGTFFDK8J1.DTL>

Many advocates of embryonic stem cell research continue to make broad but unsupported claims about the financial savings that will be realized by therapies based on stem cell research. These projections are premature, particularly since many high-tech medical treatments raise rather than contain spending on health care.

<sup>xiii</sup> Federal standards for ethical embryonic stem cell research currently exist mainly as a set of voluntary guidelines issued by the National Academy of Sciences. See *Guidelines for Human Embryonic Stem Cell Research*, <http://www.nap.edu/catalog/11278.html>. Inconsistent state regulations present an untenable situation, from the point of view of both research and governance.

<sup>xiv</sup> Special provisions of the stem cell initiative prevent the California legislature from amending any portions of it for a period of three years, and after that, only by a 70 percent vote of both houses of the legislature. Although CIRM is a state agency, these exemptions from legislative oversight effectively establish a walled-off fiscal and legal organization. Robert Klein, the controversial chair of CIRM's governing board, has repeatedly rebuffed legislative efforts to modify these provisions, and has harshly criticized Democratic State Senator Deborah Ortiz for her efforts to establish legislative oversight. For examples, see "Robert Klein: The Missing Man," *California Stem Cell Report*, March 15, 2005, <http://californiastemcellreport.blogspot.com/2005/03/robert-klein-missing-man.html>;

"Institute's chairman raps senator for bill," Terri Somers, *San Diego Union-Tribune*, June 8, 2006, <http://www.genetics-and-society.org/newsdisp.asp?id=1020>



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<sup>xv</sup> See CGS's "Conflicts of Interest at the California Institute for Regenerative Medicine," <http://www.genetics-and-society.org/policies/california/conflicts.html>.

<sup>xvi</sup> As noted by Susan Fogel of the Pro-Choice Alliance for Responsive Research, "Unlike other types of medical research, where testing on human subjects occurs only much later in the process and after laboratory experiments have indicated that certain safety levels have been achieved, SCNT research requires that women be the first guinea pigs." (Press release from the Pro-Choice Alliance for

Responsible Research, Our Bodies Ourselves, and the Center for Genetics and Society, "Unregulated Stem Cell Research May Put Women's Health At Risk," (March 7, 2005) at [http://www.genetics-and-society.org/resources/cgs/20050307\\_cirm\\_press.html](http://www.genetics-and-society.org/resources/cgs/20050307_cirm_press.html) ). See also "A Pro-Woman Stem-Cell Policy," Marcy Darnovsky, *TomPaine.com*, October 26, 2006, [http://www.tompaine.com/articles/2006/10/26/a\\_prowoman\\_stemcell\\_policy.php](http://www.tompaine.com/articles/2006/10/26/a_prowoman_stemcell_policy.php)

<sup>xvii</sup> For the California bill of eggs for research, see footnote 8. For CIRM's policies, see "Compiled CIRM MES Regulations," [http://www.cirm.ca.gov/laws/pdf/AdoptedRegs\\_100010.pdf](http://www.cirm.ca.gov/laws/pdf/AdoptedRegs_100010.pdf)

<sup>xviii</sup> For CGS's summary of public opinion surveys on reproductive cloning, see <http://www.genetics-and-society.org/analysis/opinion/summary.html#1>

<sup>xix</sup> Concerns about the CIRM's commitment to health equity policies were expressed forcefully at a March

2005 Senate Health Committee hearing by John Yuasa, Health Policy Director at the Greenlining Institute: "It would appear from all the indications thus far that the stem cell program is being formed largely to benefit the rich at the expense of the poor and ethnic minority populations," Yuasa said. "In fact, it can be seen from recent revelations that this program has all the appearances of a subsidy program for the wealthy and is a snub at the ethnic minorities of California." Transcript of the Joint Assembly Health and

Senate hearings on "Implementation of Proposition 71" (March 9, 2005) at [http://www.sen.ca.gov/ftp/SEN/COMMITTEE/STANDING/HEALTH/\\_home/PROP\\_71\\_OVERSIGHT\\_TRANS\\_CRIPT.doc](http://www.sen.ca.gov/ftp/SEN/COMMITTEE/STANDING/HEALTH/_home/PROP_71_OVERSIGHT_TRANS_CRIPT.doc)