

Re: NOT-OD-26-088, Request for Information (RFI) on Proposed Changes to Reporting Outcomes from NIH Peer Review

Submitted via nih.gov

Dear NIH Center for Scientific Review Leadership:

We write to oppose the proposed changes to NIH procedures for assessment and funding of extramural grants as put forward in the recent Request for Information (NOT-OD-26-088). The North American Vascular Biology Organization (NAVBO) consists of researchers and clinicians working to understand and treat cardiovascular disease. The current grant funding system depends on study section review by experts and assignment of scores and percentiles. These metrics are then considered, along with institute priorities, for funding. This system best serves the interests of American taxpayers because it ranks grant applications based on both scientific merit and public health impact, which should be our gold standard.

We acknowledge that the current system is imperfect. However, the proposed changes in NOT-OD-26-088 represent a fundamental shift in this process that will affect thousands of scientists and billions of dollars in federal research funding. We recommend taking time to carefully think through changes to how grant funds are awarded. Changes to this process should be implemented in a way that considers the feedback of all stakeholders and that continues to ensure that the most meritorious research projects receive funding via a transparent process.

It is unknown whether the proposed changes would solve current imperfections. Briefly, the proposed changes would bin the applications into quartiles, with the top 25% considered "Most Competitive", the 25-50% considered "Competitive", and the bottom 50% "Not Discussed". Reviewers would still provide critiques and individual criterion scores, and a final impact score would still be calculated internally to assign a category, but that underlying final impact score and any percentile would no longer be released to the principal investigator, applicant institutions, NIH program staff, or Advisory Councils. It is unclear how final funding decisions will be made or whether merit scores will inform these decisions, but two aspects of the proposed changes are particularly concerning and will likely trigger unintended consequences. The two specific issues that concern NAVBO and our members are:

1. The proposed changes would turn grant funding into a "black box" and counter the mandate to increase transparency in the process. PIs and all other stakeholders would receive far less feedback regarding the proposals and the decision process. There would be no record of where in the first quartile (or second) a grant sits that has been awarded funding. It is common to have Institute *pay lines* (often 5-10%) that encompass only a small portion of the first quartile of grants reviewed each round. If the proposed changes are adopted, it is currently unknown who will select grants for funding that score in the upper quartiles that encompass 50% of the applications, and what criteria will be used to select awarded grants. It is unknown to what extent scientific merit will be used to make those decisions, and this scenario could lead to non-experts choosing to fund a significant portion of grants with reduced scientific merit and rigor compared to others within the eligible quartiles. Thus, the transparency of where on the scale awarded grants sit in terms of scientific merit would be lost.

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Currently , Scientific Advisory Councils provide a second level of review to the institutes that already considers thematic priorities in addition to scientific merit. While not perfect, this system has produced the strongest national research program in the world.

Moreover, although peer reviewer critiques and criterion scores would be generated, it is unclear who would have access to this information. Thus, it is not clear how input from the primary reviewers or the review panels will be utilized to make funding decisions, or how transmission of this information to Council under the proposed changes might increase the administrative burden to NIH staff.

2. It is unclear what feedback will be given to applicants regarding their proposal, and any feedback will be untethered to funding decisions. Applicants will not know where in the quartile their grant resides This change would disadvantage all PI's—including and perhaps most especially junior investigators—because it would provide less direction regarding where grants stand and how to improve them. Moreover, it is unclear whether the applicants will have access to the written critiques and individual criterion scores. If critiques are not released to applicants, it will be difficult for applicants to understand their grant application's strengths and weaknesses at all. If critiques are released to applicants and stakeholders, it will not be clear whether and how this information is tethered to funding decisions, preventing applicants from understanding how different aspects of the application were weighted in the overall decision. Most new applications go through a revision cycle to be competitive for funding, and all feedback plays a critical role in oversight of the grant award process and subsequent progress. The current processes also provide valuable scientific feedback to heighten the scientific rigor and public health impact of funded research. Without scientific reviewer feedback or getting initial reviewer feedback without the context of how it contributes to the funding decision, will leave investigators not knowing what is needed to improve their planned research and be competitive for funding. Thus, grant writing will be done in a vacuum, and this will ultimately delay scientific progress towards treatments for diseases.

For these primary reasons we oppose the proposed changes to NIH extramural grant review. We strongly encourage the NIH to carry out a thoughtful, thorough and transparent assessment of the current system's strengths and weaknesses, then propose changes that preserve the rigor, transparency and accountability in funding decisions supported by the current process and preserve the ability for applicants and other stakeholders to obtain comprehensive feedback on their applications. Thank you for your consideration of our comment.

Respectfully submitted,

North American Vascular Biology Organization Leadership
On behalf of the NAVBO Public Affairs Committee