

March 13, 2020

Advisory Committee to the Director
National Institutes of Health
c/o Gretchen Wood
One Center Drive, Room 126
Bethesda, MD 20892-0147

Submitted electronically via email: woodgs@od.nih.gov

Dear Committee Members,

The Federation of American Societies for Experimental Biology (FASEB) appreciated the update on the implementation of the recommendations of the Advisory Committee to the Director's (ACD's) Next Generation Researchers Initiative (NGRI) Working Group on December 12, 2019. Notably, this is the first update on the initiative since the Working Group's [Final Draft Report](#) was released in December 2018. Although this update provided valuable information, more frequent regular reports regarding progress towards implementation of the Working Group's recommendations are needed. We look forward to increased engagement in the future and offer the following feedback for consideration.

Clarity of Guidelines for Implementation of NGRI across Institutes and Centers

Progress in Theme 1, modify the original NGRI policy, is prominent. The automatic extension of the window for Early Stage Investigators (ESIs) and Pathway to Independence Awards by one year for childbirth is commendable. Similarly, the number of ESI R01 equivalent awardees significantly exceeding the original goal of 1100 demonstrates successful implementation of aspects of Theme 2, develop methods to identify and support "at-risk" and early stage investigators.

However, as noted in [prior comments](#), FASEB continues to encourage National Institutes of Health (NIH) to provide transparent guidelines regarding ESIs success rates across the individual Institutes and Centers (I/Cs). Following these data, added emphasis should be placed on the importance for scientists to apply to the I/Cs and/or centers that are the best scientific fit rather than the highest probability of funding. Additionally, it remains unclear how resubmissions of ESI applications are handled by study section.

Furthermore, guidance on how at-risk status is determined for Multi-Principal Investigator grants or subprojects within Program Project grants would be valuable clarifying information. Overall, clear guidelines for implementation of the NGRI policy across all I/Cs may be more effectively communicated to applicants and reviewers.

Analysis of Salary Support

Recommendation 2.9 suggested completion of an analysis of salary support within one year; as the Report was released in December 2018, we were expecting an update on this front. As noted by several ACD Working Groups, both past and present, models of various caps on salaries drawn from NIH grants utilizing recent data are crucial to understanding how a proposed salary cap may affect individuals at different career stages. In its 2015 [report](#), Sustaining Discovery in the Biological and Biomedical Sciences, FASEB reiterated concerns regarding the level of “soft” money for salary support. Effective stakeholder engagement on this issue cannot occur without relevant data being widely available. If the analysis has been completed, we look forward to robust dissemination and stakeholder engagement. Otherwise, we hope to see this recommendation prioritized.

Stephen I. Katz Award Implementation

The proposed Stephen I. Katz Award for ESIs appears to be an excellent mechanism to encourage new lines of research and foster transitions to independent careers. Particularly, the ban of preliminary data submission and five years of funding support emphasize the spirit of supporting ESIs in new research directions. We look forward to this funding opportunity announcement and hope additional information – such as goals regarding number of awards and how the Katz awards will be counted within overall goals for supporting ESIs – will be provided.

Funding Gap for Early Stage Investigators and At-Risk Investigators

Data presented on R01 funding rates by career stage painted a striking picture. Established investigators in 2016 were funded at a much higher rate than ESIs and at-risk investigators; that gap appears to be closing in 2019. However, a gap in funding levels still exists and may partially be because ESIs and at-risk investigators have a much worse chance of having at least one grant application discussed. Likelihood of application discussion may be further exacerbated for applicants who are underrepresented minorities. This difference in grant discussion does not appear to be a result of merit, as best priority scores do not significantly differ between ESIs, at-risk, and established investigators. These data suggest a need to assess potential biases in the peer review process.

Administrative Data Enclave Implementation

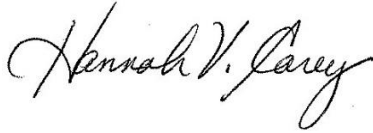
An enclave of administrative data, proposed in Theme 5, transparency efforts and engagement with scientists to inform policy decisions, would be an extremely valuable resource that may aid in informing policy decisions impacting the biological and biomedical workforce. FASEB [submitted comments](#) in response to a Request for Information on the need for an NIH administrative data enclave, and we look forward to further developments of this resource.

Expansion of Scientific Content Covered by the Loan Repayment Program

Increased maximum reimbursement for the loan repayment program already in place is likely attracting more physicians to NIH mission-relevant research. Expansion of the breadth of scientific content covered by the loan repayment program holds promise to increase research activities by physician-scientists. However, during the ACD presentation it was not clear how what research areas the loan repayment program will be expanded to. Per the NASEM Next Generation of Biomedical and Behavioral Sciences Researchers report, we hope to see the loan repayment program become available to all individuals pursuing biomedical and biological research careers, regardless of their research area or clinical specialty.

FASEB appreciates the steps taken thus far to implement the recommendations of the NGRI Working Group. While important progress has been made, steps to address many recommendations in Themes 3, 4, and 5 appear to be limited. Without a publicly available implementation plan, it is difficult for the community to help NIH further priorities for the recommendations in the Working Group's Final Report. In particular, as efforts advance we hope to see an emphasis on systemic issues affecting next generation researchers. Therefore, FASEB strongly suggests increased stakeholder engagement to ensure participation of diverse voices and more frequent updates to ensure the research community remains informed on these important issues.

Sincerely,

A handwritten signature in black ink that reads "Hannah V. Carey". The signature is written in a cursive, flowing style.

Hannah V. Carey, PhD
FASEB President

Cc: Francis S. Collins, MD, PhD
Michael M. Gottesman, MD
Michael S. Lauer, MD
Lawrence A. Tabak, DDS, PhD
Hannah A. Valentine, MD
Carrie D. Wolinetz, PhD