



**FASEB Comments in Response to National Science Board – National Science Foundation
Commission on Merit Review (MRX) Request for Information**

[Dear Colleague Letter](#) (Published August 20, 2024)

[Federal Register Notice](#) (Published August 26, 2024)

Transmitted electronically via RFI portal on September 19, 2024

Q6 - MRX welcomes any other comments on or suggestions for improving NSF's current Merit Review criteria, policy, and processes. It also welcomes information about aspects of Merit Review criteria, policy, and processes that are currently working well.)

The Federation of American Societies for Experimental Biology (FASEB) appreciates the opportunity to contribute to the National Science Board-National Science Foundation Commission on Merit Review (MRX), the first review of the agency's merit review criteria in over a decade, via this Request for Information (RFI). While RFIs provide an opportunity for organizations such as NSF to obtain important feedback from agency stakeholders (in this case, researchers engaged in the merit review process as grant applicants or reviewers), this process is only effective if the information is collected in a manner that allows it to be integrated into the final product. MRX was established in December 2022, yet this RFI seeking the community's general impressions of the current NSF merit review policy, criteria, and process was issued nearly two years into its proposed 2.5-year timeline.

Similarly, the comment period for this RFI was 30-days, a timeframe for which FASEB has gone on record numerous times with other federal entities as insufficient for effective engagement of stakeholders, particularly for organizations representing a significant number of relevant stakeholders (in our case, over 110,000 individual researchers across 22 individual societies). To ensure that our comments reflect the diverse views of the disciplines and individual scientists we represent, our process for developing comments in response to RFIs such as this one is quite extensive, including engagement of our Science Policy Committee and Board of Directors, as well as policy staff supporting the member societies, which takes a minimum of 45 to 60 days, depending on when comment opportunity is issued. The only instances in which we are able to submit comments within a shorter timeframe are topics for which FASEB is already on record, allowing comments to be ratified through an expedited process directed by our Executive Committee. To ensure a more inclusive RFI experience, we encourage NSF to provide a minimum of 60 – 90 days for future RFIs.

While FASEB has closely monitored the efforts of MRX, this RFI is the first opportunity to engage our stakeholders on specific aspects of NSF merit review policy, associated criteria, and process since 2010-11, a timeframe that is not conducive to relying on previous statements given the turnover of volunteers and significant changes in the funding and policy landscape. Although the Federation is unable to provide specific feedback on the RFI questions due to insufficient time to engage our volunteer leadership, we shared the opportunity to our member societies and individual scientists through direct communications and social media platforms to increase awareness. We encourage future NSB commissions to consider and allow longer timelines for stakeholder engagement processes such as RFIs to ensure representative feedback.