

UC Office of the President

U.S. Department of Health and Human Services (HHS)

Title

UC Comments in Response to NOT-OD-23-034, "Request for Information (RFI) on Proposed Simplified Review Framework for NIH Research Project Grant Application"

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March 9, 2023

Center for Scientific Review
National Institutes of Health
6701 Rockledge Drive, MSC 7768
Bethesda, MD 20892

RE: UC Comments in Response to NOT-OD-23-034, “[Request for Information \(RFI\) on Proposed Simplified Review Framework for NIH Research Project Grant Applications](#)”

Dear Sir or Madam:

I write on behalf of the University of California (UC) system responding to the Request for Information (RFI) on Proposed Simplified Review Framework for NIH Research Project Grant Applications issued on December 8, 2022. The UC system is comprised of ten campuses, six academic health centers, and three affiliated U.S. Department of Energy national laboratories.

In this RFI, NIH proposes a new peer review framework for evaluating grant applications to reduce administrative burden and potential reputational bias. The proposed changes would reorganize the five peer review score criteria into three factors:

1. Importance of the Research (formerly Significance and Innovation)
2. Rigor and Feasibility (formerly Approach)
3. Expertise and Resources (formerly Investigators and Environment)

Reviewers would provide individual scores for criteria 1 and 2, but not directly score the third criterion. If the reviewer sees problems or challenges in criterion 3, the reviewer could adjust the overall score and write a brief explanation for NIH staff.

UC supports policies that diversify the scientific workforce; however, we are concerned that the current proposal may not achieve the intended outcome of reducing funding disparities at NIH among underrepresented groups. We suggest that NIH develop a system of real time outcomes monitoring to accompany this proposal, and a way to respond to those outcomes in a timely manner, especially if the proposed process is not meeting its intended goal. In addition, UC strongly suggests creating robust resources to explain the new framework. Lastly, we recommend additional steps that NIH can take to further reduce bias in the grants review process.

UC’s specific comments are provided below.

1. NIH Should Implement a Plan to Monitor Outcomes for its Proposal

It is not clear that NIH's current proposal would reduce reputational bias. As explained in Taffe et. al, 2020:

Data from the NIH show that scores from the initial peer review process are most strongly correlated with Approach and Significance, somewhat less so with Innovation, and are correlated most weakly with Investigator and Environment ([Berg, 2010](#); [Rockey, 2011](#)). Therefore, the grant review criterion most closely aligned with the person-based aspects of the application is a weak contributor to the final ranking, and therefore likelihood of funding, of grants.¹

If NIH moves forward with this RFI, UC strongly suggests that it should only do so if a plan to monitor efficacy of its proposal in real time is implemented and adjust the approach if the policy is not working. This will assure that any changes made to the peer review process in the name of reducing bias will have the desired effect. For example, NIH can assess the degree to which preliminary overall impact scores (or final voted scores) correlate with objective Investigator or Environment measures (such as the NIH funding rank of the applicant institution, the citation metrics or grant funding of the PI, etc.). This assessment can be evaluated on an individual reviewer basis and a study section basis. In any case, NIH should create baselines from existing review procedures, then examine changes in study section behavior if the new review approach is implemented.

2. Training and Robust Resources

If NIH moves forward with this RFI, UC strongly encourages NIH to develop training for reviewers, study section Chairs, Scientific Review Officers, and applicants prior to launching the new framework in order to normalize the new criteria. Resources such as interactive trainings, rubrics, and other guidelines will be crucial for consistency in review and reduced administrative burden. The guidelines should specifically describe how innovation fits into the new criterion 3 and considerations on whether the research is transformative. In addition, resources should address standards on how reviews may adjust the overall score to capture information for criterion 3.

3. Additional Steps NIH Can Take to Reduce Bias in Its Review Process

While NIH has made worthwhile strides, it has seemingly not explored other approaches to reducing bias that have shown promise in having a more tangible impact on creating equitable funding. UC suggest that NIH consider implementing the following steps:

1. Explicitly require that Scientific Review Officers who oversee the peer review process recruit diverse individuals, especially from underrepresented groups, into study sections

¹ Taffe, M., & Gilpin, N. W. (2020, December 10). Racial Inequity in Federal Grant Funding. <https://doi.org/10.31234/osf.io/ucb62>

- across all panels and types of members, including ad hoc members, special emphasis panels, and other sections that may be convened by NIH.
2. Aim to have diversity of the study sections reflect the diversity of the U.S. population, rather than the diversity of the NIH applicant pool. This diversity should reflect diversity of individuals as well as diversity of institutions (for example, by R1 vs R2 institutions, geographic distribution, minority-serving institution, etc.).
 3. Increase data transparency of grantee success with respect to race and ethnicity.
 4. Include a criterion score specifically to rate the diversity of the research team.
 5. Consider a criterion score to rate how proposals address health disparities.

Thank you for your consideration of these recommendations. We are available for discussion and look forward to working with you and your colleagues to ensure support for a diverse scientific workforce. If you have any questions concerning these comments, please contact Agnes Balla, Director, Research Policy Analysis and Coordination, at Agnes.Balla@ucop.edu.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Motton', is written over a horizontal line.

Deborah Motton, Ph.D.
Executive Director
Research Policy Analysis and Coordination
University of California, Office of the President