

***Comments of The American Association of Immunologists (AAI) in Response to NOT-AI-19-013:  
“Request for Information (RFI): Soliciting Input on the National Institutes of Allergy and Infectious  
Diseases (NIAID) New Innovator Awards (DP2 Clinical Trials Optional)”  
December 27, 2018***

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- ***Appropriateness of the DP2 mechanism:*** *The DP2 mechanism was developed by the NIH to support highly innovative research projects by new investigators in all areas of biomedical and behavioral research. The [NIAID] proposes to use this ‘high risk, high reward’ mechanism to fund ESIs or post-docs with bold new and innovative ideas with little preliminary data requirement[.]*

AAI supports the NIAID plan to initiate a pilot DP2 mechanism. Before making this new mechanism available, however, NIAID should clarify, for both applicants and reviewers, exactly what is meant by “little preliminary data.” AAI also encourages NIAID to specify for potential applicants: 1) the chance of receiving such an award, and 2) the other mechanisms that are available (including a clear description of the requirements of each) as well as the chance of receiving one of these awards.

- ***Appropriateness of the expansion of eligibility criteria:*** *NIAID’s proposed DP2 program would be available for applications only from U.S. institutions. However, NIAID would not require that the PD/PI be a U.S. citizen. By the time of award, the individual must be a citizen or a non-citizen national of the United States or have been lawfully admitted for permanent residence. NIAID would accept applications from ESI investigators who already hold a faculty position or from post-doctoral fellows, in which case the award would be activated after they obtain a faculty position. Individuals from underrepresented racial and ethnic groups as well as individuals with disabilities are especially encouraged to apply for this support.*

AAI strongly supports NIAID’s plan to make awards available to citizens and non-citizen nationals of the United States and those who have been lawfully admitted for permanent residence. AAI also strongly supports NIAID’s plan to encourage individuals from underrepresented racial and ethnic groups, as well as individuals with disabilities, to apply for this award.

With regard to the NIAID plan to accept applications from post-doctoral fellows, AAI has the following two concerns:

1. While it is true that there is the rare post-doctoral fellow who would be qualified and ready for such an opportunity, AAI believes that the post-doctoral experience provides all scientists with important research, personnel, and other experiences that are needed to manage and run a successful lab. AAI encourages NIAID to consider whether DP2 eligibility should be limited to those who have had at least two or three years of post-doctoral experience, so that the program intent that award recipients move promptly to a faculty position will not cause awardees to cut their post-doctoral experiences short prematurely.
2. AAI is concerned that activating the award after post-doctoral fellows have obtained a faculty position will add to the growing list of NIH sources of support for which a post-doctoral fellow can apply before getting a job (but use only when they have that job). This has the potential to create a culture in which institutions only consider candidates for faculty positions who already have NIH support. This could put inappropriate pressure on both the post-doctoral fellow and the NIH peer review system, and could create a cultural change that may not be helpful for early

career scientists in the long run. It would also provide institutions with no incentive for (and could actually discourage them from) increasing their investments in early career researchers. While AAI does not oppose making the award available to post-doctoral fellows, we urge NIAID to consider these concerns and any other unintended consequences, and include these in an evaluation of the program after a certain length of time.

Finally, AAI requests clarification regarding the definition of “faculty position,” and specifically, whether this includes a “research assistant professor” or similar position.

- ***Appropriateness of the program funding:*** NIAID plans to incrementally fund awardees with \$300K direct costs per year for up to five years. The applications would be reviewed by a specific Special Emphasis Panel convened by NIAID.

AAI agrees that funding awardees incrementally makes sense and is a concept that should be tested. AAI supports the NIAID plan to potentially allow for a no-cost extension at the end of the award period.

AAI also agrees that it would be appropriate for a Special Emphasis Panel to review these applications. We do, however, question whether many, if any, post-doctoral fellows could compete in a study section that also reviews applications from ESIs. If the mechanism is truly designed to include post-doctoral fellows, NIAID should consider evaluating post-doctoral fellows separately from applicants who already occupy faculty positions.

- *Any other topic the respondent feels is relevant for NIAID to consider in developing this program.*

1. AAI believes that this will be a useful experiment, but would like clarification of how long this pilot program will run and what metric(s) will be used to evaluate its success (we understand the main metric to be whether DP2 recipients receive R01 funding, but would like to see this and/or other metrics of success specified, such as accelerated tenure decisions, publication numbers and quality, etc.).

2. The NIAID RFI indicates that the “Institute plans to issue a Funding Opportunity Announcement (FOA) describing the scientific areas of interest to NIAID and indicate that applications would be reviewed by an NIAID special emphasis panel specially developed for this purpose.” Given that the stated purpose of the mechanism is to invite “bold new and innovative ideas,” AAI encourages NIAID to identify and welcome broad areas of science and to appoint to the SEP reviewers with a wide-ranging understanding of the field.

3. Although AAI supports this pilot program (which at this stage is appropriately small), AAI encourages NIAID to fund more K awards. In addition, AAI strongly urges NIAID to open the K22 award to non-citizens, as this would help the United States retain the best scientists.

4. Because, in most instances, ESIs must have sustained grant funding for promotion and tenure, NIAID should consider developing either a mechanism for the DP2 award to be transitioned to a traditional grant mechanism (similar to renewal of a traditional grant) or some other means to address this institutional requirement.