



THE AMERICAN ASSOCIATION OF  
IMMUNOLOGISTS

Submission by The American Association of Immunologists  
to the National Institutes of Health (NIH) Request for Information (RFI):  
Proposed Revised Simplified Review Framework for NIH Research Project Grant Applications

March 9, 2023

The American Association of Immunologists (AAI), the nation's largest professional association of research scientists and physicians who are dedicated to understanding the immune system through basic, translational, and clinical research, appreciates this opportunity to submit comments on the NIH "Request for Information: Proposed Revised Simplified Review Framework for NIH Research Project Grant Applications." AAI supports the proposal developed by the Center for Scientific Review (CSR) to simplify the current peer review framework to refocus reviewers' attention on evaluating the scientific merit of grant applications.

The proposed framework would consolidate the five currently scored criteria of significance, innovation, approach, investigator, and environment, into three factors:

- Factor 1: Importance of the Research (previously "significance" and "innovation")
- Factor 2: Rigor and Feasibility (previously "approach")
- Factor 3: Expertise and Resources (previously "investigator" and "environment")

While the first two factors would be individually scored using the current 1-9 scale, factor three would instead be evaluated as "appropriate" or "gaps identified" and rated in the Overall Impact Score. If "gaps identified" is chosen, the reviewer would be required to provide written justification. AAI supports this effort to focus reviewers' attention on whether the project can and should be done, while reviewing investigators and their environments within the context of the scientific project, rather than on preconceived notions or reputations. AAI commends CSR on this plan, which also aims to reduce the impact of implicit and reputational bias in scoring grant applications, a growing concern of the scientific community. We hope the revised review framework will help increase the diversity of NIH grantees, enhance opportunities for promising early career investigators, and minimize any advantages that well-funded and well-resourced investigators and institutions have under the current system. However, AAI believes that the persistent lack of diversity among review panelists members remains an impediment to NIH achieving its diversity, equity, inclusion, and accessibility (DEIA) goals, and urges NIH to continue its ongoing work to diversify review panels.

AAI also appreciates that the proposed changes to the framework aim to reduce the level of burden placed on reviewers by simplifying the review of Additional Criteria and reserving the assessment of some Additional Review Considerations for program staff. Utilizing drop down selections of either "appropriate" or "concerns," the latter of which will require brief written justification, would decrease

reviewer workload and refocus attention on the science. AAI would like to highlight, however, that while careful consideration should be given to all Additional Criteria and Considerations, special attention should be paid to the Inclusion of Women, Minorities, and Individuals Across the Lifespan. If the importance of this section is de-emphasized in any way, it could hinder progress toward NIH's broader DEIA goals. NIH should make clear that any concerns noted with this criterion should be fully justified and reflected in the Overall Impact Score.

Noting that the NIH would not implement the proposed framework until 2024 at the earliest, AAI thanks NIH for rolling out its proposal over an extended period of time with multiple opportunities for stakeholders to provide feedback. In addition, AAI is pleased that NIH set a very reasonable 90-day comment period for responses to this RFI. AAI encourages NIH to continue to proceed slowly and thoughtfully to prepare the biomedical research community for these changes. A well-organized, clearly communicated implementation plan that will give the community sufficient time to understand and prepare for the new criteria is essential. Further, we stress the crucial need for timely and adequate training for all involved, including reviewers, applicants, and program staff.

Finally, AAI urges CSR to develop specific and defined metrics to measure the success of the new framework. This will require NIH to identify and communicate – at the outset – its desired outcomes and lay the groundwork for a thorough evaluation, which AAI also recommends, of whether the changes have achieved the stated goals, and continually monitor the effect these changes are having on peer review outcomes. It is also vital for such an evaluation to identify any unintended consequences.

AAI thanks NIH for its efforts to help diversify the pool of grant awardees by revising the peer review framework in a manner that emphasizes scientific merit and seeks to limit reputational biases. AAI believes that the proposed plan will provide clearer guidance to reviewers and make some progress toward alleviating the burden that reviewers have been experiencing. Please do not hesitate to contact AAI Director of Public Policy and Government Affairs Lauren Gross, J.D. ([lgross@aai.org](mailto:lgross@aai.org)), if you have questions or if AAI can be of any assistance.