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September 30, 2024

Lindsey A. Criswell, M.D., M.P.H., D.Sc.  
Director  
National Institute of Arthritis and Musculoskeletal and Skin Diseases  
9000 Rockville Pike  
Bethesda, MD 20892

Dear Dr. Criswell:

[The American Association of Immunologists \(AAI\)](#) is the nation's largest organization of immunologists and scientists in related disciplines whose mission is to improve global health and well-being by advancing immunology and elevating public understanding about the immune system. Your efforts to maximize investment in a diverse portfolio of meritorious research grants and a broad array of principal investigators (PIs) are appreciated. AAI and its members strongly support funding a robust portfolio of investigator-initiated research and are acutely aware of the importance of optimizing spending in a difficult funding environment. AAI is concerned, however, about some aspects of the NIAMS funding policy (Policy) set to go into effect in fiscal year 2025 ([NOT-AR-24-013](#)), especially the potential negative impact on team science.

As you know, the nature of biomedical research today is highly collaborative. Research projects often require expertise across multiple disciplines, institutions, and career stages. Immunologists regularly engage in interdisciplinary collaborations with investigators in numerous biomedical research fields. For example, they form indispensable partnerships with computational biologists to better understand and utilize large data sets.

These interdisciplinary partnerships are not only vital to advancing science but often ensure feasibility of ambitious, high-impact research that can take many years and drive major discoveries. In many instances, multiple principal investigator (MPI) grants do not provide the same level of funding per investigator as individual R01 and R01-equivalent grants. Under NOT-AR-24-013, researchers may choose to pursue funding through individual grants rather than grants that support multiple investigators, which could potentially sacrifice collaboration and innovation. AAI is particularly concerned that senior principal investigators might be dissuaded from applying for MPI grants with earlier-stage scientists who seek mentorship and collaboration to advance their research.

In addition to limiting collaborative research, this Policy could create financial challenges in an already difficult funding environment. For example, a three-grant limit could put a PI with two smaller multi-PI awards and one larger award in a precarious financial situation if the larger grant is not renewed.



Finally, AAI is unaware of evidence suggesting this Policy will “maximiz[e] the scientific impact of [NIAMS’s] investments in investigator-initiated biomedical research,” which is the policy’s stated goal. Before this Policy goes into effect, AAI recommends that NIAMS establish and communicate clear metrics to evaluate whether its goals are being achieved.

AAI appreciates the opportunity to provide feedback to NIAMS. Please do not hesitate to contact AAI Director of Government Affairs Jake Schumacher ([jschumacher@aai.org](mailto:jschumacher@aai.org)) or me if AAI can be of further assistance on this or any other topic.

Sincerely,

A handwritten signature in black ink that reads 'Cherié Butts'. The signature is written in a cursive, flowing style.

Cherié Butts, Ph.D.  
Chair, AAI Committee on Public Affairs