

February 28, 2023

Center for Scientific Review  
National Institutes of Health  
6701 Rockledge Drive MSC7768  
Bethesda, MD 20892-7768

RE: Request for Information on Proposed Simplified Review Framework for NIH Research Project Grant Applications

Comments transmitted electronically via [RFI website](#) on February 28, 2023

On behalf of the Endocrine Society, thank you for considering our comments on proposed changes to the National Institutes of Health (NIH) peer review criteria for research project grant applications. Founded in 1916, the Endocrine Society represents approximately 18,000 physicians and scientists engaged in the treatment of and research on endocrine disorders, such as diabetes, hypertension, infertility, obesity, osteoporosis, and thyroid disease. Our members also include basic and clinical researchers who are primarily funded through the NIH, and are therefore invested in a fair peer review system for grant applicants, as well as a streamlined process for those serving as reviewers.

We appreciate the iterative process and time spent by committees reviewing, deliberating, and consulting with stakeholders to adjust the critical process of peer review. We welcome the goal of the proposed changes to alleviate 1) high administrative burden on reviewers, and 2) implicit or reputational bias against applicants. We believe the proposed changes will make important progress towards those goals. As a member society, we also support and endorse the comments submitted separately by the Federation of American Societies for Experimental Biology (FASEB). Below, we identify several additional considerations that our members share for further consideration by CSR.

We are particularly encouraged to see scoring of the investigator changed from a 1-9 score to a binary appropriate/expertise needed approach. Implemented properly, and with training for reviewers on the intention behind the change, this change could significantly reduce explicit reputational bias against researchers whose environment is appropriate for the research project proposed, but may currently get a reduced score when their research environment is compared against others. Moreover, the issue of implicit bias may persist in the new scoring framework, particularly in the "Rigor and Feasibility" factor where the scoring of the investigator may explicitly or implicitly be incorporated into "Feasibility"; this issue will need to be directly addressed by NIH or IC leadership in peer reviewer training.

We also raise a potential concern regarding score compression with a reduction to 2 scored categories. Without proper consideration, this could lead to clustering of applications with similar scores without clear differentiation between proposals. However, we think this can be addressed through the anticipated reduction in administrative burden on reviewers with the new system, allowing reviewers more time to evaluate applications holistically, and by designing new peer reviewer training sessions



with guidance on best practices for reviewers to prevent score compression.

In summary, to ensure the most equitable outcomes, we encourage the NIH to make **training for peer reviewers a priority** when rolling out these changes. Preferably, this would be via in-person training directly before the study section meets. In particular, it would be most effective to hear about these changes from a position of authority at the NIH, as opposed to an impersonal module that may not be as effective at conveying the intent and objectives of the changes.

The Endocrine Society appreciates the opportunity to provide comments on the proposed changes to peer review. We applaud the NIH for listening to the concerns of the scientific community about high reviewer workload and reputational bias against applicants. We believe these proposed changes will make significant steps towards addressing these issues and streamlining a more equitable peer review process.