

March 26, 2015

Dr. Sally Rockey Office of Extramural Research (OER) National Institutes of Health 9000 Rockville Pike Bethesda, MD 20892

Dear Dr. Rockey,

After reviewing notice NOT-OD-15-032 "New Biographical Sketch Format Required for NIH and AHRQ Grant Applications Submitted for Due Dates on or After May 25, 2015" and data shared in the Rock Talk blog¹, the Endocrine Society would like to take this opportunity to provide comments on the proposed new biosketch format. Founded in 1916, The Endocrine Society is the world's oldest, largest, and most active organization devoted to research on hormones and the clinical practice of endocrinology. Today, the Endocrine Society's membership consists of more than 18,000 scientists, physicians, educators, nurses and students. Society members represent all basic, applied, and clinical interests in endocrinology and many receive a substantial portion of their research funding through the NIH.

As we stated in our June 2012 response to the NIH Biosketch Working Group², the Society encourages NIH to provide grant applicants with opportunities to highlight a diverse set of scientific achievements, thereby giving reviewers a more complete understanding of an applicant's accomplishments. However, any changes to grant application requirements must be evaluated against the additional time and effort required to comply with the new format. The new format for the biosketch is not identical to formats used by other granting agencies. Therefore, we are concerned that the modified biosketch represents a significant additional burden to investigators and reviewers, and we are uncertain of the benefit associated with the changes.

We contend that the modified biosketch does not have an impact that warrants further implementation because it will not alter the evaluation by reviewers. Further, we suspect that guidance to reviewers about how to appropriately weight the personal statement of the current biosketch format would provide far greater impact on review group outcomes. If the modifications to the biosketch do not result in any appreciable change in review outcomes, then it becomes challenging to justify the basis for the additional effort to comply with the modifications. It is concerning that the reported data from the pilot indicates that grant reviewers were the demographic

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¹ <u>http://nexus.od.nih.gov/all/2014/11/26/implementing-the-modified-nih-biosketch-format/</u> Accessed February 16, 2015.

http://www.endocrine.org/~/media/endosociety/Files/Advocacy%20and%20Outreach/Society%20Letters/SocietyresponsetoBiosketchRFI.pdf Accessed February 16, 2015



found to be least supportive of the modified format. Of particular concern is the fact that a majority of reviewers judged the modified format to be unsuitable for New/Early Stage Investigators. A variety of stakeholders, including Members of Congress, have voiced concerns over the shifting demographics of NIH grantees³. We worry that the modified biosketch may have the unintended consequence of increasing funding disparities rather than alleviating them.

While we appreciate the intent of the modified biosketch to encourage the reporting of achievements that might not be reflected in publication records, we join our colleagues at FASEB and strongly urge the NIH to reconsider the full implementation of the modified biosketch at this time⁴.

Further, we share the following recommendations to increase the reporting of research products:

- 1. NIH should include explicit instructions to applicants to include such achievements in the personal statement, e.g., using subheadings and educate reviewers on the importance of weighting the personal statement.
- 2. NIH should delay the full implementation of the new biosketch format until the full results of the five pilot studies and survey data have been released.
- 3. NIH should develop and report metrics that evaluate the burden imposed on researchers and the extent to which the modified format alters grant review outcomes. In the event that the NIH continues implementation of the new biosketch format, NIH should issue explicit guidance to reviewers about how the biosketch should be incorporated into the review process to ensure that effort spent complying with new requirements is not wasted.

The Endocrine Society supports efforts to improve the NIH grant application and review processes. We thank you for continuing to engage the research community and collect feedback on important changes to the NIH grant review process. If the Society can be of any further assistance please contact Dr. Joseph Laakso, Associate Director of Science Policy at jlaakso@endocrine.org.

Sincerely,

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Lisa Fish, MD President, Endocrine Society

³ <u>http://news.sciencemag.org/funding/2014/10/updated-fountain-youth-congressmans-plan-make-nih-grantees-younger</u> Accessed March 16, 2015.

http://www.faseb.org/pdfviewer.aspx?loadthis=http://www.faseb.org/Portals/2/PDFs/opa/2014/8.12.14%2 0FASEB%20Comments%20on%20Modified%20Biosketch.pdf#view=FitH&scrollbar=1&toolbar=1&statusbar= 0&messages=0&navpanes=0 Accessed February 17, 2015