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Jose Florez, MD, PhD
Co-Chairs
Next Generation Researchers Initiative Working Group
Immediate Office of the Director
One Center Drive, Room 126
Bethesda, Maryland 20892-0147

Dear Dr. Tabak and Dr. Florez:

In May, 2017, the NIH announced a proposal for a new Grant Support Index (GSI) program to limit the total amount of NIH-supported research to an individual principal investigator (PI). The proposed limit was intended to maximize the productivity of NIH funds by addressing possible issues such as bandwidth and diminishing returns, as well as try to reverse the trend of declining grant funding awarded to early- and mid-career investigators. The imbalance in grant funding is most notable in a chart by the NIH that shows over the last 25 years the increasing percentage of NIH investigators over the age of 60, while the percentage of mid- and early-stage NIH investigators is decreasing within the same period. After a month long discussion and request for feedback, the NIH made the decision to abandon the GSI program and instead implement the Next Generation Researchers Initiative (NGRI). This program would not limit total NIH support for any one investigator, but instead aimed to provide targeted funds toward investigators who were perceived to be most at risk – those with 10 years or less of NIH Research Project grant support. The source of funds for the NGRI was not immediately clear.

The ASCB is a professional society encompassing thousands of basic biomedical researchers in all 50 states and at all career levels. As such, our community is greatly concerned by the troubling trends and imbalance in the NIH-supported biomedical research workforce. Many productive early and mid-career investigators among our membership are struggling to retain or regain funding for their labs. Since about 70% of NIH-funded researchers only have one grant, even most currently funded PIs are only one grant away from losing their research program. This troubling statistic clearly indicates the stability of our biomedical workforce is at great risk. Clearly, maintaining the status quo at NIH is not acceptable, and we therefore urge the NIH not to abandon the discussion that started with the GSI and continue to collect feedback around these issues. We hope that the current NGRI Working Group is one example of a continuing commitment to this goal.

As the NIH NGRI Working Group continues its work, the ASCB believes that there are
basic principles that should guide its work.

1) Avoid Unintended Consequences: Any final proposal for NGRI must take into consideration impacts outside the scope of the proposal. Data gathered by the NIH reveals that mid-career researchers are equally or more at risk than early-career PIs. It is important that efforts to support one career stage not result in inadvertent stresses at other places in the career pipeline. A rigid limit on the career status of those funded by NGRI could, for example, potentially exacerbate the funding difficulties of mid-career PIs. It is also important that if funding is part of the final proposal, the funds used lead to an increase in the number of productive labs funded, rather than simply re-arranging which labs have no funding. Therefore, it is critical that the source of funds for the NGRI is identified.

2) Don’t Reinvent the Wheel: The NIH consists of 27 individual research institutes and centers, with a wide-range of experience on how to fund research. We urge the Working Group to take advantage of this experience and benefit from the successes and failures within the NIH I/Cs, taking full advantage of the successful programs already underway. We particularly recommend to the Working Group the 20 year old policy by the NIGMS regarding support for research in well-funded laboratories.

3) Policy should be NIH-wide: Since so many NIH researchers receive funds from multiple institutes, we believe any recommendation by the Working Group must apply across the NIH.

4) Transparency: To receive the support of the community that will be critical for ultimate success of any policy, the ASCB urges the Working Group to be as transparent as possible in explaining the goals of the policy and to make data widely available to the community.

5) Going beyond just the NGRI discussion, the ASCB wishes to put forward other suggestions for consideration that might address some of the current imbalance issues.
   a. Consider a grant review system similar to that used by the European Research Council, in which investigators are only competing against those at similar stages in their careers. The separate review of Early Career from other investigators in the new NIGMS MIRA Program provides another example.
   b. Limit the number of people any one PI can support with NIH funding, thereby limiting laboratory size. This would require a nuanced approach that takes into account factors that contribute to the variable costs of doing research.
   c. Use a variable percentile cut off for funding grants depending on the size of the group. Specifically, funders could use a lower percentile cut off for each incremental grant. For example, they might fund every lab with no other grant up to the 30th percentile. This will take care of junior investigators trying to break into the system and will keep more labs from closing. Then require a 20th percentile score for the second grant and the 10th percentile score for the third grant (obviously on a sliding scale rather than in big steps).

As the Working Group continues its work the ASCB stands ready to share our views with you in more detail. We also thank you for the seriousness with which you are approaching this important topic.

Sincerely,

Jodi Nunnari, PhD
ASCB President

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ASCB Chief Executive Officer