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March 23, 2022

Noni Byrnes, PhD  
Director, Center for Scientific Review  
National Institutes of Health  
9000 Rockville Pike  
Bethesda, Maryland 20892

**Re: Request for Public Comment on CSR's 2022-2027 Strategic Plan**

*Submitted electronically to [feedback@csr.nih.gov](mailto:feedback@csr.nih.gov)*

The Association of American Medical Colleges (AAMC) appreciates the opportunity to provide feedback to the National Institutes of Health (NIH) on the Center for Scientific Review (CSR) draft 5-year strategic plan. The AAMC is a nonprofit association dedicated to transforming health through medical education, health care, medical research, and community collaborations. Its members are all 155 accredited U.S. and 17 accredited Canadian medical schools; approximately 400 teaching hospitals and health systems, including Department of Veterans Affairs medical centers; and more than 70 academic societies. Through these institutions and organizations, the AAMC leads and serves America's medical schools and teaching hospitals and the millions of individuals employed across academic medicine, including more than 186,000 full-time faculty members, 94,000 medical students, 145,000 resident physicians, and 60,000 graduate students and postdoctoral researchers in the biomedical sciences.

The AAMC recognizes the critical role of the scientific peer review process in ensuring a diverse portfolio of high quality, funded research across the NIH. We are pleased to offer comments addressing the five goals proposed in the draft strategic plan.

**Goal 1: Maintain scientific review groups that provide appropriate scientific coverage and review settings for all of NIH science.**

The AAMC appreciates the development of the ENQUIRE (Evaluating Panel Quality in Review) framework and agrees that it is critical to implement a data-driven evaluation process for review groups to stay aligned with current and emerging areas of science. Particularly so that reviewers are placed in a group for which they possess appropriate scientific expertise, we recommend additional attention be paid to basic vs. clinical science topics, which may require different sets of knowledge even within the same discipline.

**Goal 2: Further develop a large cadre of diverse, well-trained, and scientifically qualified experts to serve as reviewers.**

The AAMC strongly believes that there is an urgent need to change the study section selection process such that it represents a significantly broader pool of researchers, beyond those who have received significant funding/R01 grants from the agency. Not only does the make-up of the section affect decision-making, but the act of serving on a review panel itself is a training opportunity that improves a scientist's understanding of the process and ability to write and be successful in their own applications. Study sections should have several slots available to junior investigators, particularly those who belong to groups that are underrepresented in the funding pool. We encourage CSR to integrate with the broader NIH UNITE initiative, which is considering similar issues, and recommend AAMC's detailed comments to the agency on this topic<sup>1</sup>.

We appreciate the ability of virtual review sections to include scientists in the reviewer pool who would otherwise not be able to participate, including individuals with disabilities and those with family responsibilities. We also encourage CSR to determine the cost savings from utilizing virtual platforms and redirect these funds, where possible, to supporting additional reviewers and SROs. At the same time, we acknowledge the many benefits of in-person discussion and hope CSR will continue to evaluate how best to replicate these positives in a virtual environment. Given the number of study section meetings, CSR may consider experimenting with different arrangements, including a hybrid model.

CSR should continue its work to identify innovative methods to incentivize researcher participation in study sections. The role of peer reviewer demands significant effort, and cuts into time otherwise spent conducting research and applying for grants, which are especially critical and time-intensive activities for early career researchers or those who are underrepresented in the funding pool. Potential incentives suggested by current reviewers include having extra time added to the grant application process, or eligibility for additional funds.

AAMC agrees with CSR's emphasis on reviewer training and would add that a mentorship component is equally important in developing effective reviewers. Particularly for incoming study section chairs, learning how to manage and direct a study section discussion is essential for a successful review process.

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<sup>1</sup> AAMC Comments Re: Request for Information (RFI): Inviting Comments and Suggestions to Advance and Strengthen Racial Equity, Diversity, and Inclusion in the Biomedical Research Workforce and Advance Health Disparities and Health Equity Research (NOT-OD-21-066). April 9, 2021.  
<https://www.aamc.org/media/52231/download>

**Goal 3: Further develop an outstanding, engaged, and diverse staff.**

AAMC appreciates the goals of the CSR to create a diverse and effective workforce of scientific review officers (SROs), inclusive workplace, and provide relevant training and development for staff. Creating a culture that supports retention and advancement will assist CSR in maintaining a cadre of experienced and committed SROs. We agree that there are different needs for newly hired vs. continuing SROs and that training programs should be targeted to develop specific skill sets for each type of staff, as well as for supporting both reviewers and grant applicants.

AAMC strongly encourages ongoing consultation with the extramural community regarding the qualities of an effective SRO so that any training incorporates these tenets. Initial feedback provided to the AAMC from reviewers in academic medicine noted the importance of early and frequent contact between SROs and reviewers, SRO responsiveness to queries around peer review, and a hands-on approach during a study section to keep the discussion focused and relevant.

**Goal 4: Implement changes to the peer review process to make it more fair, effective, and efficient.**

While continually improving the peer review process is understandably one of the highest priorities for CSR, we want to acknowledge the persistent challenges in achieving this objective created by the combination of stagnant paylines, an increasing number of meritorious grants that cannot be funded, and a limited reviewer pool. These factors together lead to a disproportionate focus on efficiency, which makes it difficult for the process to also be effective and fair. Reviewers particularly have noted an increase in the number of grants as well as the number of reviewers in each study section, limiting the ease and depth of discussion for any one proposal.

Regarding the administrative load of peer review, AAMC agrees that reviewer efforts would be best spent judging scientific and technical merit and supports the recommendations from CSR's 2020 advisory group report on simplifying review criteria. We especially encourage CSR to implement the recommendations clarifying budget evaluation criteria and relieving reviewers of the responsibility to evaluate "additional review considerations" which are often regulatory or administrative in scope.

AAMC shares concerns of reviewer bias, unconscious or otherwise, impacting peer review outcomes and resulting in inequities in the agency's distribution of extramural funding. We urge the NIH to develop an evidence-based approach to addressing this issue and determining the best path forward, including continued evaluation of anonymized or redacted applications and their effectiveness in both combating bias and allowing reviewers to successfully determine the research strength of a proposal.


**Goal 5: Achieve our mission through transparency, engagement with the scientific community, and a data-driven approach to decision-making.**

Building and sustaining trust within the scientific community will be dependent on CSR's continued engagement with scientists and transparency in its decision-making. This includes open communication to both grant applicants and reviewers regarding both current processes and any proposed updates.

Among the areas of improvement suggested to the AAMC is increased transparency from CSR regarding what is funded according to percentiles. Greater collaboration with NIH Institutes and Centers would improve communication around funding priorities and ensure that these are clearly communicated within an FOA. Additionally, reviewers would benefit from CSR sharing the rationale and allowing for feedback on any changes to reviewer requirements or the review process itself.

The AAMC appreciates CSR's engagement with stakeholders during the development of its strategic plan. Please feel free to contact me or my colleague Anurupa Dev, PhD, Lead Specialist for Science Policy ([adev@aamc.org](mailto:adev@aamc.org)) with any questions about these comments.

Sincerely,

A handwritten signature in blue ink that reads "Ross McKinney, Jr., MD". The signature is stylized and includes a circular mark at the end.

Ross McKinney, Jr., MD  
Chief Scientific Officer