

Dear colleagues on the NIH ACD Next Generation Researchers Initiative Working Group:

The Public Affairs Advisory Committee (PAAC) for the American Society for Biochemistry and Molecular Biology (ASBMB) commends the Next Generation Researchers Initiative Working Group for their dedication to assembling the December 2018 working group report and for their service to the biomedical research enterprise. We appreciate that the ACD NGRI Working Group considered and highlighted our [April 2018](#) and [October 2018](#) letters offering policy recommendations and feedback. We seek to continue our fruitful dialog by offering the comments below reflecting on specific recommendations from the December 2018 working group report.

**Recommendation 1.2 Discontinue the “Early Established Investigator (EEI)” definition”**

We agree with the Working Group that the early established investigator (EEI) category should be discontinued. We applaud the Working Group’s “pivot” to introduce recommendations to support at-risk investigators.

**Recommendation 1.3 Introduce the definition of “at-risk” applicants, taking into account the duration of their investigative career**

We are pleased to see the Working Group’s recommendation to introduce an “at-risk” investigator definition, consistent with our recommendation to "Establish a Program to Retain At-Risk Established Investigators" as presented in our April 2018 letter to the Working Group. However, we disagree with the point raised on slide 13 of "*concern that 'at-risk' label may cause peer reviewers to judge applications differently.*" The “at-risk” investigator status would most appropriately be applied at the programmatic level and not at the scientific review level. We recommend that binning of applications into the “at-risk” investigator pool should be done by Program Officers after the completion of peer review. This timing would prevent pre-review assignment of “at-risk” investigator status from positively or negatively impacting reviewer scoring.

Furthermore, we recommend that the “at-risk” status not be broadly applied to ESI or mid-career investigators with no prior independent research funding, but rather to those investigators at-risk of losing their only source of independent funding. The application of “at-risk” investigator status to ESIs unnecessarily complicates recent efforts by NIH that have successfully increased the funding rate for ESIs and potentially dilutes the benefits that could be applied to mid-career investigators.

**Recommendation 2.9. Conduct, within one year, a detailed analysis of salary support derived from NIH grants by updating the 2007 study on this topic**

We thank the Working Group for agreeing with the recommendation from our April 2018 letter that a detailed analysis of NIH salary support is needed to ensure that the intended partnership between NIH and grantee institutions is equitable. Programs to fund targeted support for ESIs or at-risk investigators could greatly benefit from funds freed up by NIH salary support limits.

We also agree with the Working Group's recommendation that salary support limits instituted as a result of the detailed analysis should be phased in over a 5-10 year window. We recommend that the detailed analysis of salary support include, or be paired with, a parallel effort to examine the carrying capacity of the biomedical research enterprise. The carrying capacity, in terms of the number and distribution of investigators over the entire range of career stages, will be critical information to guide the size and scope of programs for targeted support of ESI or at-risk investigators. Grouped with data from a detailed salary support study, estimates of carrying capacity will allow NIH to most appropriately write and execute policies that ensure a sustainable and robust biomedical research enterprise.

### **Recommendation 3.1. Increase gradient of post-doctoral support levels after 5 years**

We also support the *spirit* of limited postdoc tenure and agree that an increasing gradient for post-doctoral salary levels, after 5 years, could be an effective mechanism. Sliding salary scales that significantly increase the salary of postdoctoral fellows in their sixth year and higher are already in place at academic institutions across the United States; however, the application, or even presence, of these sliding salary scales are by no means uniform. Although we provide support for this recommendation, the ASBMB PAAC proposes two key points that the Working Group should consider:

1. Policies to limit postdoc tenure should not unduly penalize postdoctoral fellows, such as would be done by the 3 year limit recommended in the NASEM report.
2. Policies limiting postdoc tenure must be accompanied by corresponding increases in the availability of funds for staff scientists. Whether through independent grant mechanisms, or supplement to R01s, NIH should take an active role in promoting and enabling staff scientist positions as a viable career path. Members of the ASBMB PAAC note that investigators face particular difficulty in supporting staff scientists on a modular R01 budget.

### **Recommendation 5.3 Create a standing Working Group to monitor and refine the policy recommendations for the Next Generation Researchers Initiative**

We fully support the transition to a standing Working Group that will analyze proposed policies, monitor existing policies, and refine recommendations for new policies. We look forward to continued discourse and to working together to ensure the sustainability of the biomedical research enterprise. We hope that the standing Working Group will comprise of scientists representing multiple career levels, including those who are early career scientists themselves. We encourage NIH to partner with scientific societies to identify diverse candidates for membership on the standing Working Group.

### **Recommendation 5.4 Appoint scientists from across career stages and life experiences to NIH working groups and committees**

We praise the Working Group for their commitment to improving diversity & inclusion and fully support recommendations to appoint scientists from diverse backgrounds and career stages both to NIH working groups and committees. Furthermore, we counsel that all members of NIH ACD committees and working groups should be afforded the opportunity to substantively contribute to the committee or working group charge and to have their ideas seriously considered. We also recommend that NIH commit to appointing scientists from diverse backgrounds and career stages to the advisory councils for each institute.



American Society for  
Biochemistry and Molecular Biology  
11200 Rockville Pike, Suite 302  
Rockville, Maryland  
20852-3110

We thank you for considering our comments and look forward to our continued partnership as we work to develop a stronger and more sustainable biomedical research enterprise. Please do not hesitate to contact Benjamin Corb, Director of Public Affairs at [bcorb@asbmb.org](mailto:bcorb@asbmb.org), if you have questions or comments regarding our letter.

Public Affairs Advisory Committee  
American Society for Biochemistry and Molecular Biology  
February 2019