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

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

As the Next Generation Researchers Initiative (NGRI) Working Group of the Public Affairs and Advisory Committee (PAAC) of the American Society of Biochemistry and Molecular Biology (ASBMB), we would like to follow up our April 25 letter with comments on the report issued at the 116th meeting of the ACD (June 14-15, 2018). We hope to continue our fruitful dialog with the NIH as you identify and propose policies to ensure the sustainability of the biomedical research enterprise. In particular, we wish to provide feedback regarding proposed policies for the next generation of scientists and for at-risk investigators with the common goal of supporting the future of biomedical research in the United States. Below we present our responses to several portions of the ACD NGRI Working Group report.

The ESI status clock

Major theme 1, Slide 15: We were pleased that the ACD Working Group has considered altering the previous eligibility criteria for early stage investigator (ESI) designation, a move that we support. However, of the two proposed options for the status clock, we favor the second, as it better accounts for variability in training paths, including non-traditional paths and paths in different disciplines within biomedical research. The first definition using a 12-15 year window may be too short for investigators in multidisciplinary fields requiring multiple postdoctoral training appointments and, at the same time, may be too long for investigators in fields where shorter postdoctoral fellowships are sufficient. We favor using time from the start of the investigator's first independent position as the anchor date, requiring institutions to certify eligibility for designations as is common practice for scholar awards. This approach is successfully utilized for awards from the Pew Charitable Trust, the Camille and Henry Dreyfus Foundation, the Cottrell Scholars Collaborative, and the National Science Foundation CAREER program to support investigators who are in a similar career stage as NIH ESIs.

ESIs and multi-PI grants

Major theme 1, Slide 16: We agree that shifting the focus to meritorious at-risk investigators is critical. We also agree that the approach to have ESIs maintain their ESI status while receiving support from multi-PI grants is helpful to their scientific development and pursuit of an independent research program. However, before changes are made in study section format, we would like to see data that indicate that clustering of ESIs and at-risk investigators together during review leads to a fairer review process.

Methods to identify and support ESIs and at-risk investigators

Major theme 2, Slide 17: We agree it is important to develop grant mechanisms to support ESIs and at-risk investigators. We encourage NIH to expand their current efforts. While awards such as the DP2 and DP5 are valuable mechanisms for supporting outstanding ESIs, the limited number of awards made by these programs limits impact. We applaud the goals of the more widely used NIGMS MIRA R35 and encourage NIH to more broadly implement similar programs.

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Meaningful and sustainable diversity

Major theme 3, Slide 18: We firmly agree that a diverse and inclusive scientific workforce is crucial for the future of life sciences in the U.S. The NIH should expand programs which aim to diversify the pool of NIH reviewers and grantees. We would like to see increased monitoring and reporting by NIH of outcomes on progress toward a diverse and inclusive scientific workforce.

Distribution of investigators

Major theme 4, Slide 20: We agree that the question of how many investigators and their research programs can be stably supported by NIH is an important question. Arriving at an answer may permit re-distribution of some NIH funds to ESIs and at-risk investigators. However, the ACD must be careful not to arrive at an answer that would inadvertently influence career choices among early career scientists who might be easily discouraged by negativity or by a form of stereotype threat. Furthermore, as the biomedical research enterprise is an exceedingly complex endeavor with a diverse array of stakeholders, great care must be taken when generating a 'carrying capacity'. We appreciate and support the working group's goal that recommendations stemming from 'carrying capacity' modeling allow for both evaluation and course correction. We also advocate that these recommendations be paired upfront with suggested evaluation metrics and timelines to be used by NIH instead of requiring the NIH to simultaneously implement recommendations and develop evaluation metrics *de novo*.

We thank you for being open to our suggestions and recommendations, and look forward to our continued partnership in developing a stronger and sustainable scientific enterprise. Please do not hesitate to contact Benjamin Corb, director of public affairs at bcorb@asbmb.org, if you have questions or comments regarding our letter.

Next Generation Working Group
Public Affairs Advisory Committee
American Society for Biochemistry and Molecular Biology
October 2018