May 23, 2017

Dr. Lauer:

The American Society for Biochemistry and Molecular Biology (ASBMB) applauds the efforts of the National Institutes of Health to enhance the sustainability of the biomedical research enterprise through the proposed Grant Support Index (GSI) program. Consistent with our previous calls for increased funding predictability and sustainability (1), we support the intent to distribute grant funds more broadly. However, we also wish to express our concern with detrimental consequences that would result from the GSI weighting scheme as currently proposed.

Our chief concerns fall into three general categories: 1) Using “points” as a proxy for grant dollars will create unintended inequities; 2) Including training awards and core service grants will unjustly punish educational and service efforts; and 3) Maintaining the current weighting scheme will unfairly penalize collaborative research.

1. The ASBMB recommends that NIH-wide limits on investigator grant support be based on dollars rather than surrogate measures such as points. To address the concern that different types of research have different costs, we further propose that funding levels should not be capped absolutely, but rather that exceeding a limit should trigger a detailed review of an investigator’s overall funding portfolio. This system would pair dollar “limits” with Council reviews, much like the current NIGMS funding threshold, and would allow for rational exceptions. In short, a dollar-based threshold system would more appropriately accomplish the NIH-stated goals of freeing up additional grant funds and reconcile research cost differences, and would eliminate unintended inequities.

Two illustrative examples of such unintended inequities are: 1) The proposed GSI scheme assigns the same weight to a $400k/yr established investigator MIRA (2) as to a $250k/yr new and early stage investigator (NI/ESI) MIRA (3). This scheme thereby biases the GSI against NI/ESI and contradicts the NIH-stated goal of producing additional funding opportunities for NI/ESI. 2) Similarly, the points-based GSI metric would assign fewer points to a single R35 than to two R01s that provide equivalent funding.

2. The ASBMB recommends that awards for training programs, such as T32s, and for core facilities be omitted from the GSI. PIs who lead these grants typically do not receive significant personal funding, but are instead performing significant and highly regarded
services that enhance research capabilities and improve the training of future leaders of biomedical research. Simply put, PIs will not lead training grants or oversee core facilities if they are punished for their service.

3. The ASBMB recommends that the scoring system be reweighted so that collaborative multi-PI R01s, P and U grants are not penalized unfairly. The most equitable approach would simply be to use dollars awarded to each investigator as the relevant metric (see point 1), but at a minimum the current GSI points system should be reweighted. At a time when NIH Institutes are endorsing increased support for collaboration and team science [4], overweighting of multi-PI grants would disincentivize PIs to collaborate and contribute to team science. For example, PIs within multi-PI grants often receive relatively small budgets, yet the current GSI would assign nearly as many points for participating in a multi-PI R01 grant (6 points) as a single-PI R01 grant (7 points). Similarly, the points for participating in or directing P50 Centers are currently too high.

Finally, we believe that NIH needs to analyze all of the details of the distribution scheme very carefully to avoid other kinds of unintended inequities. For example, as currently written, the proposed GSI guidelines do not appear to account for funds obtained through sub-awards to non-PI investigators. This situation would create a loophole that could be used to obtain funds outside the intended caps.

There is an undeniable need for the NIH to take steps to ensure the long-term sustainability of the biomedical research enterprise and we support the broader distribution of NIH funds throughout the research community. We thank you for working toward that goal, and welcome the opportunity to discuss our concerns and become a strong partner in developing these ideas.

Thank you – in advance – for your consideration. Please refer questions or comments to our public affairs director, Benjamin Corb, who can be reached via email at bcorb@asbmb.org, or via telephone at 240.283.6625. We look forward to hearing your response and continuing the conversation on this critically important issue.

Very Respectfully,

Natalie Ahn
President

CC: Dr. Francis Collins
Dr. Lawrence Tabak
Dr. Diana Bianchi
Dr. Anthony Fauci
References

(4) https://loop.nigms.nih.gov/2017/02/early-notice-new-program-to-support-collaborative-
team-based-science/