

NIGMS Council Statement 9-15-17

Thank you for the opportunity to comment today.

The American Society for Biochemistry and Molecular Biology (ASBMB) remains committed to working to sustain the biomedical research enterprise. We commend NIGMS efforts toward this same goal and offer our strongest encouragement for the development of new policies and funding mechanisms that will solidify the foundation of the biomedical research enterprise for years to come. For example, we support recently developed NIGMS funding mechanisms such as the R35 MIRA and technology development proposals.

In August, ASBMB sent a letter to Mike Lauer and NIH leadership in response to the newly formulated Next Generation Researchers Initiative (NGRI). Our letter offered support for the rationale and overarching goals of the NGRI, and spoke to our concerns for portions of the NGRI as proposed. Namely, we have questions regarding three aspects of the NGRI and the role of NIGMS in implementing policies consistent with the goals of the NGRI.

First, Mid-career investigators who have lost funding are not eligible for either the Early Stage Investigator (ESI) MIRA [PAR-17-190](#) or the Established Investigator MIRA [PAR-17-094](#). Given the newly proposed Early Established Investigator (EEI) designation, are there plans within NIGMS to develop a funding mechanism, or adjust a current funding mechanism, such as the MIRA, to provide additional opportunities for these at-risk mid-career investigators?

Second, the NGRI originally proposed to fund all ESI grants in the 25<sup>th</sup> percentile, or those receiving a priority score of 35 or better if not percentiled. A recent modification to the NGRI now proposes funding ESI grants with meritorious scores. Does NIGMS anticipate that ESI grants will still be funded to the 25<sup>th</sup> percentile or to a priority score of 35, or has the definition of a meritorious score changed?

Third, the introduction of the EEI designation coincided with removal of the New Investigator (NI) designation from the NIH ESI policies webpage and the NIH Glossary & Acronym list. This has the effect of removing special protections for investigators who have not previously received NIH funding, yet are more than 10 years beyond receipt of their terminal degree. Given that the median age to obtain a PhD in life sciences is 30.9 and the average age for receipt of a first R01-equivalent award is 42.6, the number of investigators in this category may be non-trivial. Does NIGMS anticipate developing funding opportunities targeted at this group of investigators?

The need to take steps to ensure sustainability of the biomedical research enterprise is clear, and we applaud efforts at NIGMS to strengthen the sustainability of biomedical research funding. We welcome the opportunity to continue to work closely with the NIGMS and the NIH to achieve this common goal, to advance the mission of the NIH, and to facilitate the cutting-edge research conducted by ASBMB members.

Thank you for your consideration.