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RE: Request for Information (RFI) on Recommendations for Improving NRSA Fellowship Review (NOT-OD-23-110)

On behalf of the members of the American Society for Pharmacology and Experimental Therapeutics (ASPET), we appreciate the opportunity to submit comments on the National Institute of Health (NIH) evaluation of the Ruth L. Kirschstein National Research Service Award (NRSA) review criteria (NOT-OD-23-110).

ASPET is a 4,000-member scientific society whose members conduct basic and clinical pharmacological research and work in academia, government, industry, and non-profit organizations. ASPET members conduct research leading to the development of new medicines and therapeutic agents to fight existing and emerging diseases. ASPET is a global pharmacology community that advances the science of drugs and therapeutics to accelerate the discovery of cures for disease. We are in constant pursuit of our Mission through research, education, innovation, and advocacy.

NIH's proposal is commendable in its goal to reduce bias within the NRSA review criteria to better evaluate the applicant's potential. ASPET is supportive of the proposed changes to the review criteria that places emphasis on trainees' accomplishments and aptitude, and strength of the science. ASPET is concerned, though, that the NIH's goal does not align with its proposed changes, especially with the level of specificity that is necessary when contextualizing or allowing for recommendations beyond one's scientific merit and potential. ASPET feels that this subtle shift to learn about the applicant may backfire and create more issues with subjective perceptions and bias.

Please provide your comments on the proposed changes to NRSA fellowship review criteria.

ASPET strongly supports revisions to the criteria used to evaluate the NRSA fellowship applications.

ASPET appreciates the removal of "Sponsors and Collaborators" and "the Research Institutional Environment" from the considered criteria. [Data from the NIH CRS Advisory Council Working Group](#) has shown that academic rank of a sponsor and an institution's record of fellowship applications correlated with the rate of discussion and fellowship score rank. This disadvantages applicants who join new labs with early career investigators and/or are in institutions that don't have a strong history of submitting applications. Therefore, removing "Sponsors and Collaborators" and "the Research Institutional Environment" from the selection criteria removes the bias that a PI and/or an institution's accomplishments and reputation brings to the qualifications of the trainee. This is a great step in supporting all trainees. Also, ASPET is very supportive of not including grades as part of the criteria. [Data has shown](#) that undergraduate grades and GPA do not accurately predict success in graduate school. We are pleased to see this corrected.

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ASPET is supportive of NIH's suggestion to evaluate a trainee's accomplishments and trajectory in the context of their stage of training and the scientific opportunities they have had as this evaluation will assist trainees who may not have had the privilege and/or early exposure to research opportunities. Yet, ASPET feels that the lack of clear and specific guidance as to how this will apply when evaluating applicants is of concern. In its current form, the revised language alone may not return the desired outcome as it can be subjectively interpreted. The NIH needs to provide specific expectations around its evaluation of a trainee's "determination, persistence, and creativity." As previously commented, the use of non-quantifiable criteria and lack of clear instruction on the judgement of said criteria, will allow another avenue for judicial bias unless properly addressed by NIH.

Please provide your comments on the proposed changes to the NRSA application instructions and materials.

ASPET appreciates the work the NIH did with its revisions of the PHS SF 424 Fellowship Supplemental to better align with the review criteria and to make it easier for reviewers to assess.

ASPET is cautious with its support with some of the supplement criteria, mainly due to the lack of clarity on how these criteria will be judged. Specifically, ASPET recommends clarity on the criteria of the "applicant statement of professional and fellowship goals" and the "sponsors review of the applicant's qualifications and potential for a research career." Taken separately, these criteria are important for the judge to consider; however, paired together, there could be potential for gamesmanship. It is crucial that the NIH takes into consideration the potential conflict between an applicant's professional goals and what the sponsor describes as their potential for a research career. Further guidance needs to be prescriptive enough to ensure that perceptions need (or need not) be aligned.

ASPET is supportive of NIH's recommendation to allow fellowship applicants to submit an optional Statement of Special Circumstance. ASPET feels that this is a welcome step by NIH to acknowledge that unplanned life circumstances that are outside of the trainee's ability to mitigate can unexpectedly impact one's science project and should not impact scientific careers.

We thank the NIH for their continued efforts to broaden the participation of scientists and trainees in NIH funded work and we look forward to seeing the proposed changes implemented and reaching the desired goal.

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