

October 2, 2026

Submitted electronically via the Comment Form: [Proposed Changes to Reporting Outcomes from NIH Peer Review](#)

The Honorable Jayanta Bhattacharya, M.D., Ph.D.
Director, National Institutes of Health
9000 Rockville Pike
Bethesda, MD 20892

Re: Comments of the Federation of American Societies for Experimental Biology (FASEB) on the National Institutes of Health [Request for Information \(NOT-OD-26-088\)](#), [Proposed Changes to Reporting Outcomes from NIH Peer Review](#)

Dear Director Bhattacharya:

The Federation of American Societies for Experimental Biology (FASEB) appreciates the opportunity to respond to the National Institutes of Health (NIH) Request for Information (RFI) on Proposed Changes to Reporting Outcomes from NIH Peer Review (NOT-OD-26-088). FASEB is comprised of twenty-one member societies representing more than 100,000 researchers across the biological and biomedical sciences. The Federation commends the agency's efforts to prioritize scientific merit and to consider peer review information in its entirety.

FASEB's member societies steward critical components of the biological and biomedical research enterprise. They convene scientific meetings, publish high-quality peer-reviewed journals, and provide mentoring and career development programs that help ensure federally funded discoveries are rigorously evaluated, disseminated, and built upon by the broader research community, including industry. FASEB approaches this RFI both as a representative of individual investigators and as a steward of the infrastructure that translates NIH-funded research into scientific and public value, consistent with the principles of [Executive Order 14303](#), Restoring Gold Standard Science (May 23, 2025).

Rigorous, expert and merit-focused peer review remains the cornerstone of evaluating scientific quality, maintaining the credibility of science, and ensuring responsible stewardship of federal research investments. This long-standing process, while always striving for improvement, has enabled federally funded research to deliver scientific advances and new treatments, strengthen the scientific workforce, and drive American economic competitiveness. We encourage NIH and federal science agencies to reinforce the value of merit review, to work collaboratively with scholarly societies, institutions, and scientists to further strengthen merit review, even as they work to implement new actions to advance the agency mission.

FASEB recognizes that the proposed change affects the reporting of peer review outcomes rather than the conduct of peer review itself. As proposed, however, the final overall impact score and percentile would be withheld from applicants and their institutions, from NIH program staff and Institute, Center,

and Office (ICO) leadership, and from advisory councils. FASEB further notes that the proposed “Not discussed” category would encompass both applications that were not discussed and discussed applications whose scores fall below the 50th percentile. Applying a single label to these distinct outcomes would withhold information that is available to applicants today.

FASEB agrees with the working group's observation that peer review scores are estimates with imperfect discriminative ability, and that minor differences in impact score may not represent a meaningful signal when considered in isolation. The appropriate response to imprecision, however, is to communicate uncertainty and to provide additional information and context, not to withhold the measure. Recognizing that determining the level of uncertainty in this situation might be a challenge, FASEB offers the following seven recommendations across four themes for the agency's consideration as it further develops this policy.

I. Withholding impact scores and percentiles would increase program officer workload and reduce consistency in funding decisions.

The RFI does not indicate whether NIH assessed the operational burden this change would place on program staff. If such an assessment has already been conducted, FASEB encourages the agency to make it public. Today, in addition to the application itself, a program officer has a calibrated summary of the first level of review: a final overall impact score and, where applicable, a percentile that normalizes scores across study sections. Under the proposal, that information would be withheld. Program officers would instead need to reconstruct relative merit across an entire council round from written critiques, which are not designed to support comparison across applications. This change would take effect as the Unified Funding Strategy asks program staff to weigh a broader set of factors, including ICO priorities, portfolio balance, workforce, scientific opportunity, and available funds. The result would be a greater analytic demand on program staff and less information with which to meet it.

In this regard, FASEB is concerned about three consequences the RFI does not address:

- Workload implications for program officers are not discussed in the RFI. FASEB believes the additional workload would be significant, particularly given recent significant declines in NIH staffing capacity, and could contribute to further delays in funding decisions.
- Program staff currently rely on calibrated rank ordering as one input among many in complex funding decisions. Without it, they may construct an informal ordering drawn from criterion scores, recollection of the study section discussion, or ad hoc consultation. Such a shadow ranking would lack documentation, calibration, and consistency, and would not be subject to the quality controls that govern the final overall impact score.
- Reviewers also could be discouraged by exclusion of their scores in the remainder of the process, leading to a potential disengagement of the best reviewers in the process.

Recommendation 1: FASEB urges the NIH to retain reporting of final overall impact score and percentile to program staff, ICO leadership, and advisory councils.

Recommendation 2: Before finalizing any change to reporting, FASEB asks that NIH conduct and publish an operational impact analysis, including estimated additional staff time per council round, planned training or staffing to absorb the additional workload, and the guidance program staff will receive on comparing applications without a numerical impact score. If the agency relied on an external analysis, FASEB requests the agency provide a citation and public access to that report.

II. The score and percentile provide meaningful information to applicants and their institutions.

Scores and percentiles serve a purpose for applicants and institutions that extend well beyond predicting funding outcomes. For applicants, the score is the only calibrated, cross-comparable feedback an investigator receives about how a proposal stood among its peers. The end of paylines heightens rather than diminishes that function. When funding outcomes depend on a wider and less predictable set of ICO considerations, the score becomes an applicant's primary remaining evidence of how the scientific merit of the work was assessed, separable from programmatic factors the applicant cannot influence. Access for program staff and access for applicants are distinct problems requiring distinct remedies; restoring one would not resolve the other.

The RFI notes that the proposed approach would align NIH with practices at the National Science Foundation, the Department of Energy, and the U.S. Department of Agriculture. Those agencies differ from NIH in the volume of applications reviewed, the structure of their review panels, staffing roles and resources, and the role of resubmission in their funding cycles. NIH applicants routinely revise and resubmit, and a calibrated score is what makes that decision an informed one. FASEB encourages the agency to explain how the comparison accounts for these differences before relying on it as a rationale for the change.

Practicing researchers at all career stages stand to lose if the score and percentile are not shared. Early career researchers stand to lose the most under the proposed change. A “Competitive” designation spanning the 26th through 50th percentile does not distinguish an application that narrowly missed funding from one requiring fundamental redesign. That distinction determines whether an early career investigator resubmits, restructures, or redirects a line of work. For investigators without a record of prior awards against which to calibrate, the numerical score is the feedback mechanism least dependent on institutional advantage. Removing it would leave early career researchers at less well-resourced institutions without information that supports a broader distribution of research funding.

Institutions rely on the same signal for decisions that directly affect early career researchers, including bridge funding, startup extensions, protected time, and reappointment, where a near-miss score can serve as meaningful evidence of a positive trajectory.

Recommendation 3: We urge the NIH to retain reporting of the final overall impact score and percentile to both applicants and their institutions.

Recommendation 4: FASEB encourages the agency to explain how the comparison with other agencies accounts for the differences before relying on it as a rationale for the proposed change.

Recommendation 5: FASEB recommends an alternative approach: reporting both the categorical designation alongside the final overall impact score and percentile, accompanied by clear guidance that minor differences may not be meaningful. Nothing in the Unified Funding Strategy requires suppressing the score and percentile to adopt the proposed categories.

III. Reporting both the category and the impact score with percentile would strengthen transparency and allow the agency to substantiate its stewardship of taxpayer resources.

The Unified Funding Strategy commits NIH to prioritizing scientific merit. That commitment is meaningful when adherence to it can be demonstrated. Today, the relationship between reviewer assessment of merit and the agency's funding decisions can be reconstructed by NIH leadership, advisory councils, Congress, the Government Accountability Office, and the research community. Under the proposal, no party would retain ready access to the record needed for that assessment. The American taxpayer funds NIH on the premise that the most meritorious science receives support. NIH and any administration would benefit from being able to substantiate that stewardship.

The Administration and the agency have each stated commitments to reproducibility, rigor, and Gold Standard Science. Those commitments rest on the principle that consequential judgments are documented in a form that permits independent evaluation. FASEB encourages NIH to hold its own funding decisions to the standard the agency asks for the research it supports.

Recommendation 6: We encourage the NIH to create an auditable internal record accessible to advisory councils, Congress, and oversight bodies, and to retain final overall impact scores and percentiles alongside categories assigned to proposed grants in that record.

IV. Several elements of the proposed approach require clarification before implementation.

The RFI does not specify whether the proposed cutoffs would be computed within a study section, within a review cycle, or agency wide. The answer would materially change what “Most competitive” means to an applicant and to program staff. It is also unclear how the three categories would relate to the tiered designations used under the modified peer review practices continued in NOT-OD-26-069, and how the change would affect mechanisms in which percentiles currently carry policy weight, including Early-Stage Investigator considerations and certain K and F awards.

Recommendation 7: Resolve these questions before implementation and publish the resulting guidance in advance of the effective date. FASEB asks that the agency issue a Guide Notice setting out the final policy, an implementation plans notice, applicant-facing FAQs, and reviewer and score-calibration guidance from the Center for Scientific Review, and that it allow at least one full application cycle between publication of final guidance and the effective date. This sequence reflects the agency's own practice in implementing the Simplified Review Framework.

Conclusion

FASEB supports NIH's commitment to merit-based review in funding decisions and urges the agency to adopt the recommendations above. These recommendations are offered in the spirit of partnership: to ensure that the agency does not inadvertently slow research funding by increasing the burden on its staff, that researchers and institutions continue to receive the information they need to develop strong proposals aligned with NIH priorities, and that the agency sustains the transparency expected of it as a responsible steward of public funds. FASEB and its member societies welcome the opportunity to provide additional information and to work with NIH to develop and implement an improved approach to reporting peer review outcomes.

Respectfully submitted,



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President

Federation of American Societies for Experimental Biology

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