



# FASEB

Federation of American Societies  
for Experimental Biology

## Representing Over 130,000 Researchers

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April 11, 2022

Noni Byrnes, PhD  
Director, NIH Center for Scientific Review  
6701 Rockledge Drive  
Bethesda, MD 20817

Comments submitted electronically via [feedback@csr.nih.gov](mailto:feedback@csr.nih.gov)

Dear Dr. Byrnes,

The Federation of American Societies for Experimental Biology (FASEB) appreciates the opportunity to provide feedback on the [draft Center for Scientific Review \(CSR\) 2022 – 2025 Strategic Plan](#). As the largest coalition of biological and biomedical researchers in the United States, representing 29 member societies and over 130,000 individual scientists, FASEB applauds the commitment of CSR staff and volunteer reviewers to continuously improve National Institutes of Health (NIH) peer review processes and ensure proper stewardship of federal funds.

FASEB supports the five overarching themes of the draft strategic plan:

- Continuous evaluation of the scientific scope and management of CSR's review committees;
- Broadening, diversifying, and training the pool of CSR's qualified peer reviewers;
- Enhanced training and development of all CSR staff;
- Changing the peer review process to improve the scientific quality and fairness of review outcomes; and
- Commitment to achieve CSR's mission through transparency, engagement with the scientific community, and data-driven decision-making.

We specifically appreciate consideration of these themes in the context of individual peer review committees and CSR as a workplace. To this point, FASEB recognizes the impact of both the volume of grant applications and NIH-wide policies on the workload of both CSR employees and volunteer reviewers and is actively engaged in the development of solutions to prepare researchers for application requirements to minimize administrative errors (and frustrations) for applicants, CSR staff, and reviewers. Similarly, FASEB supports the improved utilization of the Advisory Council as a strategic body to facilitate the Center's mission and work.

FASEB's comments on the specific goals of the draft strategic plan are presented below:

### **Goal 1: Maintain scientific review groups that provide appropriate scientific coverage and review settings for all of NIH science**

The ability of CSR staff and review panels to provide high quality assessments of the broad range of science funded by NIH is a key component of the Nation's leadership in biomedical research and is a

structure that other countries seek to emulate. FASEB appreciates the thoughtfulness of CSR's ENQUIRE (Evaluating Panel Quality in Review) framework for regular, data-driven assessment of scientific review groups, specifically the discussion of ENQUIRE review recommendations during public sessions of CSR Advisory Council meetings. To supplement this process, we encourage regular engagement of disciplinary societies to identify emerging areas of scientific opportunity, identify potential knowledge gaps in existing review structures, and recruit additional experts to serve on review panels.

**Goal 2: Further develop a large cadre of diverse, well-trained, and scientifically qualified experts to serve as reviewers**

FASEB continues to be impressed with CSR's commitment to broadening the pool of reviewers to better reflect the demographic composition of the research community. For instance, the Early Career Reviewer Program provides essential professional development for participants and ultimately aids in expanding the perspectives represented on review panels. We commend CSR for the recent expansion of the program, allowing even more Early Career Researchers to benefit from this experience.

FASEB applauds CSR's recent efforts to provide regular training and refresher courses to reviewers and study section Chairs on topics ranging from meeting management and composition of effective reviews to increasing awareness of implicit biases and impact on decision making. In addition, we strongly suggest expanding this training to include parameters for establishing review meetings as safe spaces for respectful and open conversations about the science under review. We also recommend adding regular trainings on NIH-wide policies, including requirements for rigor and reproducibility, consideration of sex as a biological variable, and the forthcoming requirement for data management and sharing plans, to ensure uniform understanding and consideration of policy expectations in reviews. This training does not need to be limited to reviewer onboarding; in fact, it could be more time and cost-effective for CSR to partner with scientific societies to offer training modules at annual conferences or related convenings.

Finally, FASEB strongly supports the objective to implement a more formal and uniform process for assessing reviewer performance. Continuous evaluative feedback will not only improve reviewer performance, but also ensure applicants receive high quality and constructive assessments of their research proposals.

**Goal 3: Further develop an outstanding, engaged, and diverse staff**

Recruitment and retention of a skilled staff that is engaged and diverse is a challenge faced by many work sectors, not just biomedical research. However, given CSR's critical role in managing review panels that determine the scientific merit of over 65,000 grant applications received by NIH each year, it is important that CSR recruit team members representing diversity of scientific training, professional networks, and lived experiences.

As the CSR team grows, it will be critical to ensure individual workloads are reasonable and balanced to minimize burnout and continue to develop talent from within. Offering role-relevant training and other career development opportunities through a new Office of Training and Development demonstrates leadership's commitment to staff development and could provide transparency about potential paths staff members can pursue within CSR.

While we agree with all three objectives within this goal area, FASEB recommends that CSR consider reordering them to prioritize Objective 3.3, Create/maintain a safe and inclusive culture that values diversity, individual and team contributions, and collective well-being, followed by the objectives on

recruitment strategies and staff professional development. This reordering would indicate leadership's prioritization of staff safety and belonging as a key workplace objective, sending an important signal to current and future CSR team members.

**Goal 4: Implement changes to the peer review process to make it more fair, effective, and efficient**

FASEB continues to be impressed with CSR's long-term commitment and continuing efforts to reduce potential bias in peer review, including tests of applicant anonymization strategies and the launch of reviewer bias training modules in 2021. This diligence has been similarly applied to efforts to protect the integrity of peer review. FASEB and its constituent societies are committed to these principles, and thus we recommend that CSR staff engage scientific societies to increase awareness of emerging integrity concerns and the process for reporting breaches of confidentiality so that these become a part of professional norms.

Just as CSR has the ENQUIRE process to provide continuous assessment of scientific review groups, FASEB strongly recommends that NIH adopt a strategy for regular evaluation of review criteria to ensure reviewers focus their attention on key factors of scientific merit and reduce administrative workload. While this process should be informed by CSR staff and standard operating procedures, it should be a trans-NIH effort to minimize Institute-to-Institute variability in application. Similarly, any discussion of potential changes to review criteria must include a robust plan for stakeholder engagement and an implementation timeline that ensures preparedness of both applicants and reviewers.

FASEB also supports the objectives within this goal that increase the efficiency, quality, and reliability of the peer review process, allowing both staff and reviewers to focus on assessing scientific merit of grant applications rather than overwhelming them with administrative tasks.

**Goal 5: Achieve CSR's mission through transparency, engagement with the scientific community, and a data-driven approach to decision making**

While CSR's recognition of the importance of clear communication with stakeholders through a variety of channels is laudable, there is still significant work to be done to achieve the objectives within this goal. Effective stakeholder engagement requires a balance of outreach measures and sufficient time for stakeholders to respond. While FASEB appreciates CSR's increased presence on social media, we encourage a combined approach of formal and informal communication strategies to ensure your messages are reaching all audiences. For instance, the Request for Information (RFI) seeking input on this draft strategic plan was communicated via blog post only; however, RFIs issued by other NIH Institutes and Centers and even the Office of the Director are posted to the NIH Guide and amplified by blog and social media posts. Some are even posted to the *Federal Register*. While these forms of communication do require additional planning and clearance, they have a much broader reach than a call for comments within a newsletter or blog.

In addition to increasing awareness of CSR stakeholder engagement opportunity, we strongly urge CSR to ensure reasonable timelines for providing comments. For organizations like FASEB, which have rigorous processes for developing consensus statements, this is a minimum of 45 – 60 days. Turnaround times of 30 days (or less!) send a signal to stakeholders – individuals and organizations alike – that the engagement process is merely procedural, and that the agency is not particularly interested in acting upon the feedback.

The final part of the engagement process is to follow-up with stakeholders to inform them of the outcomes of an RFI, including a thematic summary and how the information is being used to inform policy or procedural changes. While stakeholders appreciate acknowledgement that comments have been received, they are most interested in learning how their feedback is used.

FASEB appreciates and supports CSR's continued efforts to provide a robust and fair process for peer review within NIH. The proposed five-year strategic plan provides a clear roadmap ensure CSR has the capacity to meet NIH's needs. FASEB looks forward to working with CSR to meet these challenges.

Thank you for the opportunity to provide comments and please do not hesitate to contact me should you have any questions about FASEB's feedback.

Sincerely,

A handwritten signature in black ink, reading "Patricia L. Morris". The signature is written in a cursive, flowing style.

Patricia L. Morris, MS, PhD  
FASEB President