

March 6, 2023

Noni Byrnes, PhD Director National Institutes of Health Center for Scientific Review 6701 Rockledge Drive MSC 7768 Bethesda, MD 20892-7768

RE: Request for Information (RFI) on Proposed Revised Simplified Review Framework for National Institutes of Health (NIH) Research Project Grant Applications

Dear Director Byrnes:

The Council for the Advancement of Nursing Science (CANS) and the American Academy of Nursing (Academy) appreciate the opportunity to offer comments regarding the Center for Scientific Review's (CSR) Proposed Revised Simplified Review Framework for NIH Research Project Grant Applications. As the scientific voice for the Academy, CANS formulates and advances research, scientific training, and career development within the profession. In the effort to promote better health, CANS enhances communication among nurse scientists and the public to develop, disseminate, and utilize nursing research. The Academy serves the public by advancing health policy through the generation, synthesis, and dissemination of nursing knowledge. Academy Fellows are inducted into the organization for their extraordinary contributions to improving health locally and globally. With more than 2,900 Fellows, the Academy represents nursing's most accomplished leaders in policy, research, administration, practice, and academia.

The vision of the Academy is *healthy lives for all people*. To achieve this vision, the Academy's mission is to improve health and achieve health equity by influencing policy through nursing leadership, innovation, and science. Overall, CANS and the Academy support CSR's simplified review framework for NIH research project grant applications. We commend CSR for revising and streamlining the framework to ensure the process is more focused on the review criteria that drive the overall impact score, particularly around approach and importance. Additionally, we appreciate that the simplified framework will reduce the time required from reviewers. We offer the following comments and recommendations for CSR to consider during the finalization process of the framework. Our brief comments are outlined below and grouped by the revised framework's proposed factors for review with additional commentary on critique scoring.

Factor 1: Importance of the Research

We support the update to the main review criteria to combine innovation and significance. Under the current framework, well-studied topics such as obesity, for example, could be scored lower in innovation although the research would be significant. Under the proposed simplified framework, research project grant applications could still receive a strong score if significant yet not innovative, and importantly, it guards the importance of significance to ensure that grant applications do not rely solely on innovation. In the final framework, it will be critical to clarify for reviewers the relative weights of



significance and innovation in scoring the importance. We recommend CSR provides clear, comprehensive guidance for reviewers on how to score this factor especially given that many reviewers are familiar with scoring innovation and significance separately under the current framework.

Factor 2: Feasibility and Rigor

The approach has always been a key factor in research project grant application review and we commend CSR for affirming its importance within the simplified review framework. We especially appreciate that rigor has been explicitly called out as a criterion in Factor 2. Overall, we applied CSR for streamlining the review framework to emphasize Factors 1 and 2 as the individually scored factors for the overall impact score.

Factor 3: Expertise and Resources

On the whole, we believe that combining the assessment of investigators and the environment may alleviate some of the bias potentially involved with scoring these criteria. We are concerned, however, that this update to the review framework may not fully alleviate the potential implicit or explicit bias for reviewers to favor large, well-known institutions. CSR should also consider that reviewers' scores on feasibility as part of Factor 2 may be influenced by their assessment of expertise and resources under Factor 3 of the proposed revised framework. We recommend the scoring guidelines for reviewers be clarified to address this potential scoring bias. Additionally, CSR should clarify for reviewers within the final framework why expertise and resources have been designated as Main Review Criteria rather than Additional Review Criteria, as this factor will not be scored individually yet will influence the overall impact score. We recommend CSR further clarify for reviewers that the Additional Review Criteria will be considered for the overall impact score.

Critique Scoring

Within the proposed framework, reviewers will be requested to score Factors 1 and 2 according to the critique framework of Major Score-Driving Factors, Strengths, Weaknesses, and optional Minor Points. Under the revised framework, it is unclear how to differentiate Major Score-Driving Factors from Strengths and Weaknesses, and what constitutes Minor Points. CANS and the Academy recommend CSR ensure that each component of this critique template is clarified for reviewers in the final framework.

We applaud CSR for streamlining processes that will support research project grant application reviewers and applicants and appreciate the steps taken to alleviate potential bias in the review of investigators and the environment. We encourage CSR to further consider the impacts on scoring the proposed changes would bring, particularly relating to Factor 3. Beyond this, we reaffirm our encouragement of CSR to ensure scientists from nursing and other relevant disciplines are thoughtfully integrated into all aspects of CSR's work¹, including the review and updates to this framework.

CANS and the Academy thank you for the opportunity to provide comments on CSR's Proposed Revised Simplified Review Framework for NIH Research Project Grant Applications. We commend the efforts to improve the review process. If we can be of any assistance to you or your staff, please do not hesitate to contact the Academy's Senior Director of Policy, Christine Murphy, at cmurphy@aannet.org or 202-777-1174.

¹ American Academy of Nursing and Council for the Advancement of Nursing Science (23 March 2022). *Comments Re: Center for Scientific Review's (CSR) Draft Strategic Plan for 2022 – 2027.*https://higherlogicdownload.s3.amazonaws.com/AANNET/c8a8da9e-918c-4dae-b0c6-6d630c46007f/UploadedImages/CANS Academy CSR Strategic Plan.pdf



Sincerely,

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