June 7, 2023

Lawrence A. Tabak, D.D.S., Ph.D.
Acting Director
National Institutes of Health
9000 Rockville Pike
Bethesda, Maryland 20892

RE: Request for Information (RFI) on Recommendations for Improving NRSA Fellowship Review

Dear Dr. Tabak:

The National Postdoctoral Association (NPA) appreciates this opportunity to share its comments in response to the above-mentioned Request for Information on the proposed restructuring of criteria and materials used to evaluate NRSA fellowship applications. The Ruth L. Kirschstein National Research Service Award (NRSA) fellowships have been a cornerstone of support and training for U.S. postdoctoral scholars for decades. The value of receiving NRSA fellowships is significant for the selected individuals and fortifies the pipeline of talent into the scientific enterprise.

The NPA is a 501(c)(3) charitable and educational non-profit organization whose mission is to improve the postdoctoral experience by supporting a culture of inclusive connection. Founded in 2003, our membership is composed of more than 240 U.S. research institutions and 24,000 individual postdoctoral researchers (“postdocs”). Collectively, we represent the interests of the 70,000 postdocs training across the nation in science and research fields.

The NPA includes diversity, equity and inclusion (DEI) as a core value and engages in efforts that promote systems and policies that embrace and enhance DEI in the postdoctoral community. The NPA greatly appreciates the work of the National Institutes of Health Center for Scientific Review Advisory Council Fellowship Working Group to address concerning trends that fellowship review criteria disadvantage applicants with early-career sponsors and from non-research intensive institutions.
Overall, the NPA is broadly supportive of the proposed changes to NRSA fellowship materials and review process. Below, specific comments and suggestions are offered on the (1) proposed changes to NRSA fellowship review criteria and (2) proposed changes to the NRSA application instructions and materials.

**Perspectives on proposed changes to NRSA fellowship review criteria**

The reorganization of “Institutional Environment and Commitment to Training” and “Sponsors, Collaborators, and Consultants” into “Science and Scientific Resources” and “Training Plan and Training Resources” is viewed as a positive change towards minimizing sponsor and institutional bias and shifting the focus towards an applicant’s training potential. The NPA strongly supports this proposed change to NRSA fellowship peer review.

As the CSR introduces the new peer review criteria, the NPA asks that it ensures that the proposed changes have the intended outcome and do not, instead, allow the introduction of more bias due to subjective scoring. To help combat bias and subjectivity in scoring fellowship applications, the NPA encourages that CSR take the Fellowship Working Group’s recommendation to tailor its “peer review bias awareness and mitigation training” to be more specific for fellowship review by including specific relevant examples. The NPA also encourages CSR to expand this recommendation to also include implicit bias training and instate the training as a requirement of fellowship reviewers.

**Perspectives on the proposed changes to the NRSA application instructions and materials**

To be more inclusive of diverse talent, we must acknowledge and destigmatize deviations from “traditional” educational and career paths. The NPA strongly supports the proposed addition of an “Optional Statement of Special Circumstances.” This resource will increase the fairness of peer review by offering optional space to detail circumstances that have caused a delay or gap in an applicant’s research or training, rather than risk assumptions or take up high value space in one’s personal statement. This proposed change will specifically help protect students and postdocs that have switched labs due to harassment, experienced significant research setbacks in response to COVID-19, or taken a leave of absence for personal reasons or caregiving duties.

The NPA agrees with the scientific community that grades are not an accurate predictor of success and can disadvantage many otherwise talented applicants, therefore it supports the proposed change to remove grades from the application materials.

The proposed changes to the sponsor’s statements are also strongly supported. The new format and instructions will better emphasize the quality of training by the sponsor, rather than the quantity. Mentorship is a critical component to training, and we sincerely thank the
Fellowship Working group for carefully reworking this area to remain comprehensive yet remove areas prone to bias.

In FASEB’s comments submitted on June 2nd, it raised concerns about evaluating the new self-assessment statement in relation to the sponsor evaluation. The NPA agrees that it is not clear whether it is expected that the content of both materials be the same, similar or different. To prevent confusion by applicants, sponsors and reviewers, we join FASEB in asking that clarifications or changes be made regarding these two materials.

In conclusion, the NPA appreciates the opportunity to submit these comments and is enthusiastic about the proposed changes to fellowship peer review. We appreciate the commitment of the Fellowship Working Group and the CSR to improve fellowship peer review. I would be happy to answer any questions regarding the above material at tkimbis@nationalpostdoc.org.

Sincerely,

Thomas P. Kimbis, J.D.
Executive Director and Chief Executive Officer