



American Society of Human Genetics

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Submitted electronically

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Re: NOT-OD-26-088 – Proposed Changes to Reporting Outcomes from NIH Peer Review

Dear Dr. Jacobson,

The American Society of Human Genetics (ASHG) appreciates the opportunity to comment on the NIH Request for Information [NOT-OD-26-088](#) "Proposed Changes to Reporting Outcomes from NIH Peer Review." As the largest professional organization for human genetics and genomics research, representing many NIH-funded investigators, we support a robust peer review process. However, we are concerned that the proposed changes would undermine the transparency, accountability, and objectivity of the current system.

Erosion of Transparency in Funding Decisions

ASHG supports funding decisions grounded in scientific merit, transparency, and responsible stewardship of research funds. The proposed policy changes would directly reduce transparency in NIH funding decisions. NIH already has discretion to consider factors beyond peer review rankings when making funding decisions. For example, during urgent public health crises, NIH may fund research that aligns with critical scientific priorities, regardless of the overall impact score. However, those decisions should be visible to the public, scientists and their institutions, Congress, and NIH Institutes, Centers, and Offices (ICOs). By grouping applicants into broad bins rather than precise rankings, the proposed system would make it harder to determine whether funding decisions reflect peer review assessments or other factors, eroding public trust in the scientific funding process.

Disruption and Overload of the Peer Review Process

Operationally, the proposed changes would substantially increase the burden on those involved in all areas of peer review. By withholding specific scores, the binning system would give scientists and program officers (POs) less guidance on whether to revise or resubmit applications.

Although applicants would still receive reviewer comments, the score provides context for interpreting that feedback; an unfunded application in the top 5% carries different implications than one in the top 25%. Without this information, applicants may be more likely to resubmit grants. Also, written critiques often do not capture the full picture of reviewer and committee discussions, so the magnitude of revisions in a resubmission may not fully reflect the considerations that informed the original score. Currently, the assigned score reflects the written reviews and the nuances of discussion by reviewers and by the review committee.

To maximize their chances of securing funding to support staff and keep labs operating, scientists may be more likely to revise and resubmit all applications in the top 25%. Overall, more resubmissions add unnecessary administrative burden and add delay and expense to an already highly competitive and lengthy process.

Misalignment with NIH Values and Stated Goals

The proposed policy appears inconsistent with NIH's stated goals to prioritize scientific merit, consider peer review information in its entirety, and support a robust biomedical workforce. First, concealing peer review scores would make it more difficult for ICOs and investigators to identify differences in scientific merit among the highly qualified applications in the "most-competitive" bin. Second, total impact scores, alongside qualitative assessments, are an important component of the information used to evaluate applications; diminishing their role does not support consideration of peer review in its entirety. Finally, a transparent and merit-based funding process is important to sustain a robust biomedical workforce, who rely on these processes to establish their research programs and careers.

The uncertainty created by this policy change and likely increase in application resubmissions could hinder an already strained biomedical workforce. In addition, scores and percentiles offer important early indicators of funding viability, informing institutional and investigator decisions about already limited resource allocation while funding decisions remain pending.

Final Comments

ASHG is concerned that the proposed changes to NIH peer review outcomes reporting would reduce transparency in funding decisions, diminish the role of peer review, impose additional burdens on an already strained scientific workforce, and ultimately undermine the United States' leadership in supporting meritorious biomedical research. By reducing the granularity of peer review outcomes, the policy proposal could make it more difficult to assess the extent to which funding decisions reflect scientific merit, thereby increasing the potential for political influence.



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We encourage NIH to pursue alternative approaches that better support a rigorous, transparent, and independent peer review system.

ASHG appreciates NIH's consideration of these comments and looks forward to continued collaboration. For additional information or questions, please contact Karina Miller, PhD, at kmiller@ashg.org.

Sincerely,

Susan A. Slaugenhaupt, PhD
ASHG President