



May 22, 2017

The Honorable Francis Collins, MD, PhD
Director
National Institutes of Health
One Center Drive
Bethesda, MD 20892

Dear Francis:

We are writing concerning the proposed GSI metric limiting total grant support to individual investigators. We appreciate an opportunity to share our views. We also know that you must balance many different perspectives and goals as you consider this new model. Our overarching objective, which we know you share, is to ensure that NIH supports research that will have the greatest impact on our scientific knowledge and the health of our population.

We accept the premise that, ultimately, there is a limit on the productivity of a principal investigator based on the size of the research team and/or its expenditures. However, we have witnessed tremendous variability in this limit, reflecting the field of investigation, the nature of the research, and the vision and skills of the principal investigator. We also agree wholeheartedly with the critically important goal of supporting early- and mid-career scientists. Each of us, and many of our peers, received our first NIH grant in our early 30's, about a decade earlier than the current generation of biomedical scientists. Ultimately, providing greater access to funding for younger scientists will require a redistribution of research dollars. However, we believe that other strategies have and could be employed to achieve this goal, without implementing seemingly arbitrary limits on highly productive scientists. Our peer review system has made U.S. biomedical research the envy of the world, and we should tread cautiously when considering models designed to redistribute funding based on aggregate data, rather than individual merit. An imposed cap on our most impactful scientists may also make it more difficult to retain the very best in the American academic system.

We have reviewed our own faculty to assess the potential impact of GSI, at least as initially proposed. At Penn, approximately 48 investigators are presently over the 21 point cap, and another 52 are at the cap and would be prevented from obtaining additional funding for new ideas. These include our most impactful scientists such as one who reached 27 points as Co-PI of an R01 (6 points), PI of a P30 (4 points), PI of a P50 Center grant (11 points) and project leader of a multi-PI P01 (6 points). This collaborative scientist will be disincentivized to participate in these team projects that include vital training programs and which result in outstanding mentoring of young investigators. Others who direct T32 training grants, that include no salary or funds to their own labs, would need to give up these roles in order to maintain funds for their primary research missions. This would not be in the interest of training the next generation of scientists for our nation's future.

The Honorable Francis Collins, MD, PhD
May 22, 2017
Page 2

We are concerned that the scientific community, so well served by the NIH over many years, has not had adequate time to participate in the discussion about the implications of these significant changes in funding policy. We urge a period of thoughtful engagement and public discussion to consider the supporting data and potential implications.

With these broad concerns in mind, we offer the following recommendations:

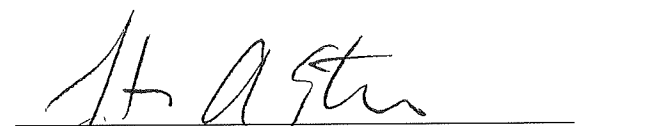
- Allow further time for review of the Lauer/Lorsch data by the scientific community and consider additional metrics.
- Adjust the GSI point system to avoid penalizing collaborative science and training.
- Incorporate strategies that allow flexibility to review and approve funding for scientists above GSI caps, as almost certainly some of this proposed work will be highly meritorious.
- Consider alternative strategies to ensure support for younger investigators.

We look forward to continuing this conversation with the NIH and would welcome the opportunity to speak to you directly about this matter.

Sincerely,



J. Larry Jameson, MD, PhD
Executive Vice President, University of Pennsylvania for the Health System
Dean, Perelman School of Medicine
University of Pennsylvania



Jonathan A. Epstein, MD
Executive Vice Dean and Chief Scientific Officer
Perelman School of Medicine
University of Pennsylvania

JLJ:JAE:mm

cc: NIH Institute Directors