

September 22, 2026

Raymond Jacobson, Ph.D.
Director, Center for Scientific Review
National Institutes of Health
6701 Rockledge Drive
Bethesda, Maryland 20892
Submitted electronically via <https://rfi.grants.nih.gov>

**Re: Comments of the American Institute of Biological Sciences on NOT-OD-26-088,
Request for Information on Proposed Changes to Reporting Outcomes from NIH Peer
Review**

Dear Dr. Jacobson:

The American Institute of Biological Sciences (AIBS) submits these comments in response to the Request for Information on proposed changes to how NIH reports the outcomes of peer review. AIBS is a nonprofit scientific association dedicated to promoting informed decision-making that advances biological research and education. Our members—scientific societies, research institutions, natural history museums, botanic gardens, biological field stations, and universities—include many investigators whose work depends on NIH support. AIBS also has over six decades of experience managing scientific peer review for federal and state agencies and other funders.

AIBS supports the principle articulated in the Unified Funding Strategy that Institutes, Centers, and Offices (ICOs) should consider peer review information in its entirety. However, we **respectfully urge NIH not to adopt the proposal to withhold final overall impact scores and percentiles** from applicants, program staff, ICO leadership, and Advisory Councils. Doing so would reduce transparency and accountability, remove information that program staff and applicants rely on, increase burden across the system, and would not achieve the alignment with other agencies the RFI describes.

1. The proposal would replace the panel's collective judgment with uninformative categories.

The RFI rightly notes that peer review outcomes contain valuable information beyond the overall impact score. But the proposal adds no new information; it subtracts the single piece of information that reflects the collective judgment of the entire review panel. Written critiques come from the three assigned reviewers; the final overall impact score is the only output that captures the votes of all panel members after discussion. Eliminating it from the record diminishes, rather than elevates, the role of the peer review panel.

The proposed categories are also too coarse to be informative. The “most competitive” bin spans the top quartile of discussed applications, yet actual funding falls far short of that threshold: according to the NIH Data Book, the success rate for R01-equivalent

applications was 13.0 percent in FY 2025, down from 18.7 percent in FY 2024, and rates at several ICOs are lower still. Within the “competitive” bin, an application that narrowly missed the top quartile is indistinguishable from one that barely cleared discussion.

2. Scores help program staff and Advisory Councils make informed decisions.

The RFI states that omitting scores will “empower program officials to utilize their substantial expertise, portfolio analyses, and good judgment.” Program officials already exercise that judgment, routinely using reviewer comments to justify funding meritorious applications that scored outside a payline. Scores allow staff managing thousands of applications per cycle to triage efficiently and to identify applications that split reviewer opinion. Removing them forces the same judgment to be exercised with less information.

The proposal would also withhold scores from Advisory Councils, the statutory second level of review. Hiding scores from Councils weakens an oversight mechanism at the same time that other proposals, including the Office of Management and Budget’s proposed revisions to 2 CFR Part 200, would expand the discretion of officials outside the scientific review process.

3. The proposal would reduce transparency and accountability to applicants, Congress, and the public.

NIH awards are public funds, and the public and Congress have an interest in confirming that awards track scientific merit. Currently, a funded application with a poor score, or an unfunded one with an outstanding score, is visible and can be explained. Under the proposal, any deviation between merit and funding within a bin becomes invisible to everyone outside the review panel, including NIH’s own leadership. Whatever the intent, a process that cannot be audited will be perceived as one that can be manipulated, eroding trust in NIH.

Withholding scores would also impair NIH’s ability to evaluate its own decisions. The literature the RFI cites on the predictive value of scores exists only because scores were recorded and analyzable; reporting them to no one forecloses the evaluation that would inform NIH whether the Unified Funding Strategy is working.

4. The proposal would increase applicant burden and resubmission volume.

Applicants use scores and percentiles to make consequential decisions months before funding decisions are final: whether to resubmit, whether to retain staff, and how to plan. A “most competitive” designation covering the top quartile provides little guidance when success rates are far below 25 percent. Predictably, nearly every applicant in both competitive bins will resubmit as a precaution, increasing the load on volunteer reviewers and scientific review officers. Early-career investigators, whose promotion and tenure cases often rest on evidence of strong review outcomes, would be hit hardest.

5. The comparison to NSF, DOE, and USDA does not hold.

The RFI states the change would align NIH with other major funders, including National Science Foundation (NSF), Department of Energy (DOE), and U.S. Department of Agriculture (USDA). In practice, those agencies' categorical systems differ from this proposal in important ways. They typically employ five or more rating categories, instruct reviewers on the meaning and likely consequence of each category, have panels deliberately assign categories and often rank applications within them, and discuss every application. The proposal would instead compute a hidden numerical score and use it to sort applications into three broad bins with no within-bin ranking. Those agencies also operate at a fraction of NIH's scale; NIH received more than 94,000 applications in FY 2025, roughly twice NSF's volume of 43,000. The RFI does not explain how practices from far smaller portfolios would function at NIH.

6. The proposal was developed without a public record.

Prior major changes to NIH peer review (1997, 2009, and the 2025 Simplified Review Framework) were developed over multiple years with published working group reports, external advisory input, and public comment on documented evidence. This proposal was developed by an internal working group whose membership, evidence base, and analysis have not been released, and the RFI describes advantages only. A change of this consequence warrants a complete public record before any decision is made.

Recommendation. AIBS's principal recommendation is that NIH **withdraw the proposal** to withhold final overall impact scores and percentiles and continue to report them to applicants, program staff, ICO leadership, and Advisory Councils. No restructuring of the categories substitutes for that information.

Should NIH nonetheless proceed with categorical reporting, the following steps would reduce, though not eliminate, the harms described above:

Report scores internally. As drafted, the RFI would withhold the final score and percentile not only from applicants but from program staff, ICO leadership, and Councils. At a minimum, those responsible for making and overseeing funding decisions should continue to receive them.

Follow other agencies' designs. Use five or more reviewer-assigned categories with defined meanings, rank applications within the top categories, and give reviewers and applicants clear guidance on what each category means.

Publish the working group's report, including its literature review, analysis of NIH peer review data, and alternatives considered, and allow further public comment on that record.

Pilot and evaluate any change in a limited set of ICOs or mechanisms, with pre-specified metrics for applicant burden, resubmission rates, and concordance between merit and funding, before agency-wide adoption.

AIBS shares NIH's goal of funding the most meritorious science and recognizes that peer review scores are imperfect. But imperfect information is far more useful than none, and the proposal would remove it from precisely the people responsible for making and overseeing funding decisions. We welcome the opportunity to work with NIH on approaches that strengthen peer review.

Respectfully submitted,



Scott Glisson

Chief Executive Officer

American Institute of Biological Sciences

cc: Jay Bhattacharya, M.D., Ph.D., Director, National Institutes of Health