



**AMERICAN
PSYCHOLOGICAL
ASSOCIATION**

March 23, 2022

Comments on [CSR Draft Strategic Plan](#)

Submitted to feedback@csr.nih.gov

Thank you for the opportunity to provide feedback on the draft five-year strategic plan of NIH's Center for Scientific Review (CSR). I am writing on behalf of the American Psychological Association, the largest association of psychologists in the U.S., with over 131,000 members, affiliates, and students who, through their work in research, education, private industry and clinical practice, seek to advance health and human welfare and improve lives.

CSR's management of peer review is one of NIH's most important activities. It is critical that the reviews and the processes and infrastructure that support them are perceived as fair and unbiased by all applicants regardless of race or research topic. It is evident that CSR is making broad efforts to reach that standard, and we appreciate the goal to "ensure diversity and fairness are at the forefront in all decisions." Below I share recommendations from the APA membership.

First, we offer APA's help to identify and recommend additional members to supplement the expertise on the CSR advisory council's working groups and other groups focused on this broad set of issues. Adding scholars of color whose expertise extends to racism and systems of oppression would bring diverse viewpoints and send a powerful signal to nonwhite scholars.

Related to the issue of expertise, the draft plan's Goal #2 states, "CSR aims to broaden its pool of well-trained reviewers and increase diversity among reviewers in keeping with the Notice of NIH's Interest in Diversity (NOT-OD-20-031)." Goal #3 states "To ensure CSR has a diverse workforce that can effectively manage peer review at current and projected levels of NIH applications." These are laudable goals, but their implementation seems dogged by too little involvement of scholars of color with expertise on racism. For example, APA members expressed concern that many reviewers for NIH's structural racism RFA had little to no expertise on racism. That was a special emphasis panel and not within CSR's control, but it was a very visible (and welcome) RFA, so a lot of attention focused on it. NIH has been engaging speakers with this research focus but they should also be sitting on the working groups, task forces, and review panels in order to bring the progress we all want to see.

The proposed CSR Strategic Plan notes that the Center posts data that measure the diversity of scientific review groups along multiple dimensions—race, gender, ethnicity, and career stage—and provides these data to staff and management to encourage continuous attention to the importance of panel diversity. While we understand the power of the maxim, "Measure What Matters," it is not clear how posting or distributing information about the diversity of scientific review groups will lead to measurable and meaningful changes. What composition of scientific review groups will reflect an optimal level of diversity to eliminate the widely documented funding gaps? What specific strategies will be taken to

diversify panels for groups that are disproportionately underfunded? How will CSR be held accountable for diversifying panels? Who will be responsible for holding CSR accountable?

CSR's plans to diversify study sections with several initiatives are important. Initially, CSR will implement diversity tracking panels, which is an excellent idea. According to the data, women are not more than 40% of all reviewers. Does this match the proportion of submitted proposals based on the gender of the P.I.? Based on race, African Americans are not more than 3% of all reviewers. Does this match the proportion of submitted proposals from Black PIs? Based on Under-represented Minority (URM) status, URM are approximately 10% of all reviewers. Does this match the proportion of submitted proposals from URM? APA strongly recommends that CSR strive to obtain representative proportions of reviewers from niche groups, which match their proportions in submitted proposals.

CSR has built a database, which includes scientists with competitive research support from outside NIH (e.g., the National Science Foundation, U.S. Department of Defense, private foundations, etc.); those at different stages of their research career, and individuals suggested by scientific societies. It would be significant to hear more about how CSR's diversity efforts have been impacted by use of this database. The public needs this information to evaluate the effectiveness of CSR's efforts.

CSR plans to analyze the effectiveness of the NIH early career review program, which has the potential to be a wonderful incubator of new reviewers. APA members who completed this program have provided a bit of feedback and recommend that CSR expand the number of times that members in the early career review program attend study sections: they support a more in-depth experience.

It is worth considering whether CSR should revise the policy stipulating that a scholar must have received an R01 before she/he can serve as a standing member on a study section. This rule compounds an institutional problem which NIH has acknowledged. If scholars of color are systematically less likely to be awarded R01s (Erosheva et al., 2020; Ginther et al, 2011; Hoppe et al., 2019), then they will not be able to serve on study sections. This process becomes cyclical and self-perpetuating. Furthermore, the expertise needed to review proposals from scholars of color or involving populations of color may not be present on standing study sections, which further contributes to this issue. Once more scholars of color are eligible to serve on study section, this might mitigate the institutional bias against those scholars.

CSR should also revisit the conflict of interest policy. There is a dearth of underrepresented scholars in higher education. According to the U.S. Department of Education, 75% of full-time faculty were White and 6% of full-time faculty were Black (U.S. Department of Education, 2020). The conflict of interest policy states that reviewers cannot review proposals if they have collaborated within the past three years. Among Black scholars, this policy has the effect of reducing an already existing small pool of reviewers who have the expertise to properly review proposals. This policy should be revised to acknowledge the historic and systemic racism that negatively affects Black scholars in order to provide equitable outcomes during the proposal process.

We agree with the Plan's statement that the chairperson has influence in setting and changing a review group's culture. However, given the documented history of funding gaps and the role of biased review processes that contribute to the gap, it is unlikely that an annual chairperson training session, as proposed by the Plan, will lead to meaningful and measurable changes. One training session per year is unlikely to reverse bias inherent in the culture of review panels, particularly if current chairpersons have a history of participating in or leading review panels that have made biased funding decisions. The plan

is silent on how chairpersons will be monitored and held accountable. Relying on panel members (particularly those who are not members of underrepresented groups) to report bias may be unrealistic.

So the quality of the training is certainly an issue that can be reviewed, but if CSR is committed to training as a means of instilling new norms, why is the targeted outcome for Bias in Review Awareness Training for reviewers 75% completion rate and not 100%?

APA supports the consideration of these recommendations that were outlined in Stevens et al (2021):

- Include an NIH “ambassador” trained in racism on all review panels. The ambassador would ensure compliance and consistency of “best practices” across study sections (e.g., fairly drawn discussion lines, equitable grant discussion ratios based on diversity metrics such as race/ethnicity and gender prior to panels, inclusion of Black faculty on panels). The ambassador would observe dialogs and intervene and mediate when racism or bias occurs. Reviewers should be enabled to communicate with the ambassador during and after each panel. Issues raised by ambassadors must be acted upon in the panel and later by NIH as above.”
- “More Black PIs should be included on study sections. NIH should institute a minimum number of Black reviewers on each panel and publish a timeline over which this number will represent the U.S. population.”
- “Create efficient mechanisms for reporting racist or biased conduct during and after review panels. This includes developing a standardized policy to remove reviewers with a history of offenses from the reviewer pool and publicizing policies, offenses reported, and NIH follow-up actions in annual reports.”

I want to raise the issue of research topic preference, although we understand there is lack of consensus whether research topic bias contributes to the funding disparities found among investigators of color. Hoppe, et al, (2019) held that there is a “lack of a one-to-one correlation” between study sections and scientific topics, meaning that, “independent of the study section in which the reviews are conducted, some topics might be favored and others disfavored.” Further stated in this study, “results demonstrate the existence of topic preference, meaning that different topics are accorded different levels of acceptance and/or enthusiasm, which may reflect shared, broadly held views on the relative scientific value of different areas of research.”

The study found that, once an application reaches the point of being discussed, controlling for topic choice reduces the funding gap by 21% (Hoppe et al., 2019). **In other words, reviewers prefer certain topics over others, despite the fact that awards in less studied topic areas did not produce less influential science than those in higher studied (and successfully funded) topic areas.** Given that scholars of color study a different distribution of topics (i.e., health disparities and patient-focused interventions; socioeconomic, health care, disparity, lifestyle, psychosocial, adolescent, and risk) than the topics studied by the largest overall number of applications (Hoppe et al., 2019), strategies should be implemented to address the issue of favored topics. It would be useful for CSR to speak more directly about the issue of topic bias to reduce concerns in the behavioral and social science community that it may disadvantage investigators from these disciplines.

APA is grateful for CSR’s many efforts to effect a review process and infrastructure that is fair to all applicants. Please let me know how APA may be helpful as you finalize and implement this plan.

Sincerely,



Mitch Prinstein, PhD

Chief Science Officer

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