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On behalf of the Society for Neuroscience (SfN), thank you for the opportunity to respond to the National Institutes of Health (NIH) Request for Information (RFI) on proposed changes to reporting outcomes from NIH peer review (NOT-OD-26-088). As the world's largest organization dedicated to advancing the understanding of the brain and central nervous system, SfN is committed to advancing biomedical research that drives innovation, improves public health, and maintains the United States' global leadership in scientific discovery. Although SfN supports efforts to strengthen NIH decision-making, SfN is concerned that the proposed approach would decrease the role of scientific judgment in funding decisions and reduce transparency and accountability by limiting access to information that is currently available and vital to applicants and others involved in the funding process.

Under the proposal, reviewers would continue to score discussed applications, and NIH would continue to calculate final overall impact scores and percentiles, but those results would be withheld from applicants, institutions, program staff, Institute and Center leadership, and advisory councils. The same scientific information would therefore exist but would be unavailable to the people responsible for interpreting reviews, making funding recommendations, conducting second-level reviews, and improving applications. This is not merely a change in presentation but would materially change how peer-review judgments can inform funding decisions.

Peer review scores are not currently, and should not be, the sole determinant of funding decisions. NIH has long considered programmatic priorities, emerging scientific opportunities, workforce needs, and portfolio balance alongside scientific review. However, peer review remains the foundation of NIH's funding process. While scoring may not always distinguish between two closely ranked applications, it may still convey a consequential difference between an application near the top of a review group and one near the bottom. The proposal therefore creates several serious risks.

Concerns with the Proposed Reporting Changes

1. It would decrease the role of scientific judgment in funding decisions. Although peer reviewers would continue to score applications, the proposal would reduce their collective scientific judgment to a threshold for broad categorization. By withholding the scores that distinguish applications within the "most competitive" category, NIH

would prevent advisory councils and Institute leadership from fully considering the review panel's assessment when selecting awards. Peer review would therefore function less as the primary scientific basis for funding decisions and more as an eligibility screen, shifting greater influence to administrative priorities and creating additional levels of approval at a time of significant uncertainty in NIH scientific leadership.

2. It would weaken transparency and accountability. When scientific assessments and programmatic considerations lead to different conclusions, how and why the final decision was
made should be transparent. Removing full scoring data would make it more difficult for applicants, advisory councils, Congress, and the public to determine when funding decisions depart substantially from peer-review judgments.
3. It would increase the burden on second-level reviewers. NIH advisory councils cannot exercise their oversight responsibilities as efficiently if they receive less information about the scientific evaluations produced during the first stage of review. While this proposal aims to strengthen second-level peer review, we believe that second-level reviewers are already appropriately thorough in their reading and review and should continue to be provided with all available information.
4. It would deprive applicants of detailed information they need to interpret critiques and decide whether and how to revise and resubmit. Broad categories cannot provide the same guidance as an overall score and percentile, potentially adding uncertainty, delay, and expense to an already demanding application process. This loss of feedback will not only impact the applicant's success in the review process but also limit the ability to identify potential weaknesses in their proposal and make substantive improvements that could strengthen the research proposal and advance scientific discovery.
5. NIH has not provided enough evidence or process transparency to justify a system-wide change. The RFI does not identify the working group's membership or charter; disclose the literature, NIH data, analyses, or recommendations it considered; explain how alternatives were evaluated; demonstrate that other agencies' practices are comparable to NIH's distinctive two-stage system; or specify how NIH would measure and revisit the effects of implementation. That lack of transparency is particularly concerning because the proposal conflicts with NIH's own commitment that Institutes and Centers should consider peer-review information "in its entirety." NIH should prioritize substantive peer review, which must include transparency of the judgments produced by the full review panel.

Impact on the Neuroscience Research Community

For neuroscientists, the proposed changes would have particularly significant consequences because neuroscience research often involves long-term, complex, and interdisciplinary projects that require substantial investments of time, expertise, personnel, and institutional resources before an application is ever submitted. By replacing detailed overall impact scores and percentile rankings with broad categories, NIH would eliminate critical information that investigators and their institutions use to understand how their applications were evaluated relative to other proposals and to make informed decisions about future submissions.

Importance of Detailed Review Outcomes for Neuroscience Research

Neuroscience grant applications frequently require years of preliminary data collection, the establishment of collaborations across multiple disciplines, development of sophisticated methodologies, access to specialized equipment and animal models, and significant contributions from trainees and research staff. The current peer review process reflects this substantial investment by providing applicants with detailed critiques, overall impact scores, and percentile rankings that allow them to understand the relative competitiveness of their application. While no scoring system is perfect, this data provides important context about how a proposal was assessed by scientific experts and helps applicants determine how best to strengthen future submissions. Eliminating access to this information would reduce transparency and leave applicants with significantly less ability to interpret review outcomes

Impact on Resubmission and Continuous Improvement of Applications

The proposed reporting structure would also undermine one of the most important features of the NIH peer review system, which is the opportunity to improve and resubmit meritorious applications. Many NIH-funded projects are not funded on the initial submission. Instead, investigators carefully analyze reviewer comments, assess the relationship between their score, percentile ranking, and institute funding patterns, and spend months revising and strengthening their applications for resubmission. The difference between an application near the top of a funding range and one near the bottom of a broad category can substantially inform decisions about whether to revise, redirect, or pursue alternative funding opportunities. Without access to scores and percentiles, investigators would lose an important benchmark for evaluating the likelihood of future success, potentially resulting in unnecessary resubmissions, abandoned projects containing scientific merit, or inefficient use of limited research resources.

Effects on Early-Career Investigators and Emerging Areas of Neuroscience
The proposal would be especially challenging for early-career investigators and those working in emerging areas of neuroscience. These researchers often rely heavily on detailed review outcomes to understand expectations within the field, improve grant-writing skills, and strategically plan future submissions. Broad categorical designations such as "most competitive" or "competitive" provide far less actionable information than current reporting practices and may make it more difficult for investigators to navigate an already highly competitive funding environment. Over time, this could discourage innovative ideas, increase uncertainty for researchers at critical career stages, and weaken efforts to cultivate the next generation of neuroscience investigators.

Conclusion
SfN therefore urges NIH to withdraw the proposal in its current form and continue reporting final overall impact scores and percentiles to applicants, institutions, NIH program staff, Institute and Center leadership, and advisory councils. Rather than restricting access to peer-review information, NIH should improve guidance on how scores should be interpreted and used alongside other considerations. For decades, rigorous peer review and investigator-initiated research have been foundations of American leadership in biomedical science. Defending that system does not require claiming that it is flawless. It requires insisting that changes be supported by evidence, developed transparently, and accompanied by safeguards commensurate with their risks.

SfN welcomes continued engagement with NIH on approaches that strengthen peer review while preserving the information, accountability, and public confidence on which the biomedical research enterprise depends. Thank you in advance for your consideration, and please contact SfN's Director of Advocacy and Training, Adam M. Katz, at akatz@sfn.org, with any questions.

Sincerely,

Diane Lipscombe, PhD
Chair, Government and Public Affairs Committee, SfN