



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

National Institutes of Health
Bethesda, Maryland 20892

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TO: Office of Management and Budget (OMB)
Through: Mikia Currie, NIH Project Clearance Branch
Office of Policy for Extramural Research Administration
Office of Extramural Research, OD, NIH _____

FROM: Carol Wigglesworth, Grants Policy Analyst
Division of Grants Policy
Office of Policy for Extramural Research Administration
Office of Extramural Research, OD, NIH

SUBJECT: **Amendment to the Biographical Sketch Instructions in the PHS 398
and PHS 2590 (OMB No. 0925-0001, expires 6/2012)**

The PHS 398 enables public and private organizations to compete for funds appropriated to the various components of the Public Health Service; the PHS 2590 is the annually required noncompeting continuation progress report. The purpose of this memorandum is to seek OMB approval of a change to the instructions for the Biographical Sketch (see Biographical Sketch Format Page attached), which is part of the PHS 398 and PHS 2590.

The Biographical Sketch is required in competing applications (PHS 398 and SF424 (R&R)) to provide information about Program Directors/Principal Investigators (PD/PIs), senior/key personnel, other significant contributors, career development award candidates, and participating faculty and fellowship applicants for National Research Service Awards (NRSAs). Biographical Sketches are required in non-competing continuation progress reports for new senior/key personnel, new other significant contributors, and new participating faculty on an institutional NRSA training award.

Biographical Sketches are used in two ways: (1) by NIH extramural program officials and grants management specialists to ascertain qualifications and to monitor awards by ensuring that personnel are appropriately trained and qualified for their role on a project; and (2) by peer reviewers in their evaluation of the scientific and technical merit of applications through the NIH peer review system.

Extramural scientists have questioned perceived inequities in the NIH grant review process because there is no clear way to address personal career impediments in a grant application. This is a particularly serious issue because peer reviewers must explicitly assess the productivity of the Principal Investigator (PI) and other members of the research team as part of their assessment of one of five core review criteria - Investigator. NIH scientific review groups use the information in the Biographical Sketch to gauge the probability that the proposal will be effectively executed if an award is made, and determine whether the PI has demonstrated an ongoing record of accomplishments that have advanced their field(s).

The lack of a clear place to describe family care responsibilities, illness, disabilities, and other factors that may influence productivity means that everyone is assumed to be fully employed and working at all stages leading up to the preparation of an application. A career hiatus can occur at any time, and we also know that this is a more predictable problem for women who often shoulder the primary responsibilities for child care and other family care issues.

The NIH has some experience with this issue. In 2009 the NIH instituted an Early Stage Investigator (ESI) policy to provide specific incentives to those who are within ten years of completing their terminal research degree. At the time the ESI status was created NIH established a system to allow applicants to extend that status for various personal reasons, including family care, clinical training, military service, natural disasters, and other factors. It turns out that more than half of the requests for ESI extensions come from women and about half of all requests (women and men) involve family care.

Currently, there is no way to convey information about career interruptions to peer reviewers, implicitly biasing the process against those who may have had a lapse in their career. To level the playing field and help obviate these factors from the peer review process, the NIH Workgroup on Women in Biomedical Research Careers recommended, and NIH Director Dr. Frances Collins concurred, that NIH should offer an opportunity within the Biographical Sketch that allows applicants to explain any lapses in productivity that might have been caused by illness or other factors. Not everyone will have a need to provide this kind of information, but for those that do, it is expected that the opportunity to be welcome.

NIH proposes to change the Biographical Sketch instructions by adding the instruction in bold type below. These Biographical Sketch instructions appear in Section 4.6 of the PHS 398, Section 4.5 of the SF 424 (R&R), and Section 2.2.4 of the PHS 2590, as follows:

Following the educational block, complete sections A, B, C and D:

- A. Personal statement. Briefly describe why your experience and qualifications make you particularly well-suited for your role (e.g., PD/PI, mentor) in the project that is the subject of the application. **Within this section you may, if you choose, briefly describe factors such as family care responsibilities, illness, disability, and active duty military service that may have affected your scientific advancement or productivity.**
- B. Positions and Honors...
- C. Peer-reviewed publications or manuscripts in press...
- D. Research Support...

We estimate that this change will have no effect on the total burden hours currently associated with the PHS 398 and 2590, listed below. **Note that the Biographical Sketch is one part of an extensive application package for PHS support (PHS 398) and a scientific progress report (PHS 2590) for recipient organizations, and the burden hours for the Biographical Sketch are not calculated separately.** The page limit for Biographical Sketches will remain at 4 pages.

Estimate of Hour Burden				
Types of Respondents	Number of Respondents	Frequency of Response	Average Response Time	Annual Hour Burden
Applicants (PHS 398)	11,815 (paper) <u>57,685</u> (electronic) 69,500 (total)	annually	35 hours (paper) 22 hours (electronic)	1,682,595
Grantees (PHS2590)	37,000	annually (only for new personnel)	15 hours	555,000
Total	106,500			2,237,595

Thank you for your consideration of this request.

Attachment: Biographical Sketch Format Page