

March 15, 2012

Dr. Alain Beaudet  
President, Canadian Institutes of Health Research  
Ottawa, Canada

Dr. Jane Aubin  
Chief Scientific Officer/Vice-President, Research, CIHR  
Ottawa Canada

Dear Drs. Beaudet and Aubin,

We are writing in response to your request for feedback on the Design Discussion Document that describes proposed changes to CIHR's Open Suite of Programs and to the Peer Review process. Our thoughts were also informed by the presentations and discussions that took place during the Open Forum held March 8th at the University of Toronto.

First, we wish to thank you and the Task Force for your efforts in designing these reforms. Peer review in particular has been in need of change for some time, especially in terms of revamping the existing Grants Panels and ensuring that grants are reviewed by those with appropriate expertise.

However, we were very surprised by Dr. Beaudet's summation of the Open Forum. He indicated that he had not heard major concerns expressed with respect to the proposed reforms whereas our perception of the discussions led very much to the opposite view. Our concerns as well as suggested alternatives are described below.

### **Open Grants Program**

We do not see a need to reform the Open Grants Program. There was not a well-articulated rationale for changing the current Program to dual Program/Project streams, and indeed there are a number of disadvantages that were clearly described by participants during the Open Forum. For example, it is not clear that 7-year Program grants will enhance flexibility and provide more time for research, especially if the recipients are expected to shoulder a greatly increased reviewing load under the proposed reforms to Peer Review. Disadvantages include an inability to expand one's program mid-stream with additional funding and the spectre of losing funding altogether if a Program Grant renewal is unsuccessful. Likewise, there is little evidence that the Project Stream will encourage greater funding of innovation over the current system. Reviewer expectations regarding feasibility and preliminary data are purported to stifle innovation. However, the proposed introduction of a Stage 1 Letter of Intent will simply delay such expectations until Stage 2 of Project Grant review. Furthermore, biomedical research, especially in Pillar 1, is not well served by grants requiring a defined end point, with uncertain opportunities for renewal.

Most importantly, the proposed reforms do nothing to alleviate the crisis situation that the Open Grants Program finds itself in. It is a simple fact that the amount of money available for funding Open Grants is inadequate, resulting in excellent grants not being funded. Under the proposed reforms, the funds available will not change, the number of funded investigators will remain roughly the same, and overall success rates will either not change or will decrease further as new investigators enter the system. The inevitable result is that many more excellent grants will not be funded, leading to repeated resubmissions and attendant reviewer fatigue. Tinkering with the concept of distinct Program and Project funding streams is a distraction from the fundamental problem currently plaguing the Open Grants Program.

However, if CIHR is intent on proceeding with the proposed reforms to the Open Grants Program, despite the concerns raised by PIs across Canada, we offer the following suggestions:

- 1) Program Stream: There is a risk associated with applying to the Program Stream in that if one is unsuccessful one has to wait until the next cycle to apply for a Project. Perhaps potentially meritorious Program applications from individuals who do not meet the "applicant stature" criteria could be shifted to the Project stream at the Letter of Intent stage.
- 2) Program Stream: Funding for these applications must be realistic. Applicants will be in a very difficult situation if they receive 70% of the requested budget and are locked into inadequate funding for their programs for 7 years.
- 3) Program Stream: Bridge funding must be made available in the event of an unsuccessful Program renewal. This must be sufficient to carry a program through to the next Project Grant opportunity. One could also consider shifting unsuccessful Program renewals into the Project Stream *within the same competition*.
- 4) Program Stream: There is a concern that the Program Stream will be dominated by large labs and that excellent researchers running more modest operations will have difficulty competing for Program Stream funding. Mechanisms need to be in place to ensure the success of excellent Program applications regardless of their size.
- 5) Project Stream: Project definition must be sufficiently flexible to allow for funding of projects that do not have a well-defined end point. We can envision *many* investigators who may not qualify for the Program Stream but have excellent ongoing research programs that will be best served by renewable funding.
- 6) Both Streams: We are concerned that large Program Grants will, over time, dominate the Open Grants funding envelope at the expense of Project Grants. This needs to be monitored carefully and a cap placed on total Program Grant spending.
- 7) We strongly disagree with the proposal to incorporate the integrated knowledge translation funding opportunities (PHSI, Knowledge Synthesis and Knowledge to Action) and the partnered commercialization funding opportunities (Proof-of-Principle and Industry-

Partnered Collaborative Research Program) into the Open Suite of Programs. It is very likely that the incorporation of these programs will further drain funding from the existing (or proposed) Open Grants Program. Furthermore, these very short term, highly focused, defined outcome grants cannot be reviewed in the same context as other grants that are submitted to the existing (or proposed) Open Suite of Programs.

### **Peer Review**

As mentioned above, we agree that the current Peer Review and Grants Panel structure limits access to expert review of grants. We support efforts to ensure that appropriate expertise is brought to bear during the process of grant review. However, we have serious concerns regarding the feasibility of proposed reforms to Peer Review.

First, the concept that one can separate proposed ideas and the applicant's credentials during the review process is untenable in our view. We are all seasoned reviewers and it is central to our evaluation process that we assess both the ideas and the capability of the applicant to carry them out. The proposal that Stage 1 of the Project review be focused on ideas rather than ability just means more culling of non-doable proposals at Stage 2. It will be exceptionally difficult to triage Project Grants at Stage 1 if based on ideas alone. With the expected input of institutional grant-writing services, most of these idea-based LOIs will sound appealing. The only place where partial separation of credentials and ideas may work is at Stage 1 of the Program Stream, where applicant track record is paramount.

Our second serious concern relates to reviewer burden. The proposed reforms are intended to reduce reviewer burden but the opposite is clearly the case. Having 5-8 expert reviewers at the first two stages of review, plus additional reviewers at Stage 3, represents a drastic increase in reviewer demands. This is clear simply by comparing the current process involving 3 reviewers per grant (primary, secondary and reader) to the proposed process of 5-8 reviews per grant x 2 stages. Assuming that the number of available reviewers does not change, this represents a 3- to 5-fold increase in the number of applications per reviewer! Alternatively, 3 to 5 times as many reviewers will be required - where will they be found? The estimated times for review at stages 1 and 2 are also not realistic, particularly factoring in "virtual discussion" time for *each* grant. In our view, highly competent reviews can be obtained with 3 expert reviewers.

Our third concern relates to the elimination of face-to-face reviewer discussion at Stage 2. It is unclear whether its replacement with "virtual discussion" will be effective. If virtual discussion is instituted, it should take the form of real-time video conferencing between 3 reviewers, after preliminary reviews are made available.

We question the value of Stage 3 review. It is highly unlikely that Stage 3 reviewers will read the grants nor will they be experts in the grant topics. Their opinions will be informed by reports from Stage 2 reviewers and their scores. This is inadequate for effective discussion of grant merits and flaws at Stage 3. If there is a Stage where reviewers need not be face-to-face, then it is at Stage 3, where reviewers are not experts in the grant topic. Ironically, this is the sole stage proposed for face-to-face discussion.

Consequently, we suggest the following:

- 1) Stage 1 review of Project LOIs should include both ideas and the applicant's ability to carry them out. LOIs need to be roughly 3 pages in length to allow the applicant the opportunity to express both ideas and capabilities.
- 2) No more than 3 expert reviewers should be recruited for Stage 1 and Stage 2 review of Program or Project applications.
- 3) Efforts must be made to ensure that Stage 2 reviews incorporate real-time discussion between reviewers. Following online posting of reviews, reviewers should discuss reviews and reach a consensus via video or audio conferencing. Online discussion via electronic posts and instant messaging are discouraged as they are inefficient and, as such, increase reviewer workload.
- 4) Eliminate Stage 3 review for both Programs as it adds little to the rigour of Peer Review.
- 5) Regardless of the nature of the reforms instituted, they must be rolled out slowly in the form of pilot projects. This will ensure early detection of problems and the incorporation of solutions. For example, staged review could be implemented in the Fall 2012 and Spring 2013 competitions for grants submitted to just 2 or 3 panels.

In closing, we would like to thank you again for the substantial effort expended in developing these reforms and we hope you will consider our concerns and suggestions during your efforts to refine the details. The CIHR has been very successful in funding excellent science since its inception and we trust that with careful, staged introduction of reforms this tradition will continue. There is a great deal at stake and we are committed to helping ensure that the best decisions are made as we move forward.

Sincerely,

The Research Committee  
Dept. of Biochemistry, University of Toronto

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Dr. Grant Brown, Professor

A handwritten signature in red ink, appearing to be 'W. Houry', with a long horizontal line extending to the right.

Dr. Walid Houry, Professor

Handwritten signature of Angus McQuiban in black ink, featuring a stylized 'A' and 'M'.

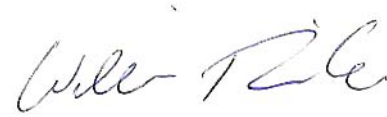
Dr. Angus McQuiban, Assoc. Professor

Handwritten signature of Emil F. Pai in black ink, appearing as 'E. F. Pai'.

Dr. Emil F. Pai, Professor

Handwritten signature of Craig Smibert in blue ink, appearing as 'C. Smibert'.

Dr. Craig Smibert, Assoc. Professor

Handwritten signature of William Trimble in blue ink, appearing as 'W. Trimble'.

Dr. William Trimble, Professor

Handwritten signature of David B. Williams in blue ink, appearing as 'D. Williams'.

Dr. David B. Williams, Professor