NIH Request for Information (RFI): Proposal to Cap the Number of Simultaneous Research Project Grants per Principal Investigator to Support More Researchers and Maximize Scientific Productivity and Innovation

- **Submit responses via**: https://rfi.grants.nih.gov/?s=6a1f200c6e0a7544e30b3f12

Pros and/or cons of the policy (500 characters): NIH's peer-review process has durably identified the most rigorous science. A cap could broaden the distribution of funding and reduce its concentration among a relatively small group of established investigators, but there's little data identifying an optimal number or demonstrating that a cap would improve the overall research enterprise. It could threaten the sustainability of labs, as one or two R01s are often insufficient to support personnel, infrastructure, and rising operating costs.

The optimal number of RPGs for the cap (2, 3, or 4) (50 characters): Higher cap preferred over lower (4 if any).

Strengths and weaknesses of the proposed implementation strategies (500 characters): If the goal is to redirect NIH funding to under-resourced institutions, those institutions may require significant investments in research infrastructure and workforce capacity before they're positioned to successfully compete for and manage additional funding. Careful implementation and pacing would therefore be essential to achieving the intended goals. Also, many academic institutions expect PIs seeking tenure or promotion to maintain multiple active grants and a cap may harm early career PIs.

Possible unintended consequences or policy loopholes (500 characters): A grant cap including multi-PI grants could have unintended consequences by discouraging senior investigators from serving as multi-PIs or collaborators on junior investigators' grants. Experienced researchers often join these projects to mentor early-career scientists and strengthen research pipelines, not to accumulate funding. Penalizing participation in multi-PI or multi-site collaborations could weaken research networks and reduce opportunities for mentorship and career development.

Other comments (750 characters): While the NIH's goals to support a greater number of investigators, geographies, academic institutions, and career stages are commendable, the Women First Research Coalition (WFRC) urges NIH to consider unintended consequences from a cap. Capping the number of PI and MPI grants could slow scientific progress by limiting the ability of experienced investigators to lead high-impact research, particularly during rapidly evolving public health challenges. MPI grants often provide important opportunities for more experienced investigators to mentor and collaborate with early-career researchers, particularly those at institutions with fewer research resources. Counting MPI grants toward the cap could discourage these collaborations, reducing opportunities for career development while also disincentivizing participation in large, multi-site and multidisciplinary projects that are essential to advancing team science. If a cap were adopted, it should be no lower than four active grants. Arbitrary limits could increase the proportion of grant budgets supporting personnel costs rather than other research

costs. Merit-based peer review, not administrative caps, remains the best method for allocating funding.