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Mr McKeon,
Chair, Strategic Review of Health and Medical Research,
PO Box 4226
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26/3/2012

Dear Mr McKeon,

SUBMISSION TO McKEON REVIEW

This submission addresses the following question raised by your call for submissions: "How might health and medical research be best managed and funded in Australia?" It is to express my opinion that sufficient concerns exist regarding the structure, processes and outcomes of the NHMRC Project Grant review system, that it warrants review.

I am a medical researcher, funded by the NHMRC since 1991, and have served on six NHMRC Grant Review Panels (GRP), one Regional Grant Interview Committee, one Program grant panel, one Grant Reviewer Selection Panel, and in various review capacities for other organisations, including the NIH in the USA, the MRC in the UK and the HRC in New Zealand. As President of the Australasian Society for Immunology 2007 – 2008, I edited a non-commissioned report on the NHMRC Project Grant Scheme by the Society.

What follows is a brief list of concerns raised with me or by me, and communicated to the NHMRC, its Council or its staff over the last 5 years:

1. Timing of the provision of documents for review can be so delayed that the reading of all of them is not possible.
2. Dissociation between external reviewer comments and scores in documentation provided to GRP removes the opportunity to identify a rational basis (if any) for scores provided.
3. Not for further consideration (i.e. "Not Competitive") triage of grants was performed on grants with average scores of 5 (i.e. "Highly Competitive").
4. Conflict of Interest handled inappropriately.
5. Grants were disadvantaged by being allocated to GRP with no expertise in relevant Disciplines.
6. Grants were disadvantaged by being considered in the first week of GRP sitting, due to delays in provision of documents or secretariat support.
7. Grants were disadvantaged by unequal numbers of reviewers.
8. Grants were disadvantaged by unequal periods for writing rebuttals.
9. Grants were disadvantaged by unequal workloads between GRP.
10. Some applicants' time was wasted by the NHMRC requesting rebuttals for grants that were deemed "Not for further consideration".

11. Excessive changes in processes occurred between years; these were often idiosyncratic in nature and were handled badly by secretariat and academics.
12. Mentorship/training of Secretariat, external reviewers and GRP members has deteriorated.
13. The use of a single person to select external reviewers (“Academy member”) for a GRP does not provide sufficient coverage of the Discipline; on occasions the individual is not even expert in the Discipline concerned; the individual does not get to see the reviews, so cannot distinguish between good and poor reviews or reviewers, and cannot provide mentorship to reviewers.
14. In some cases, GRP chairs were selected with interests too distant from the Discipline of the GRP, preventing them being able to effectively chair discussion (in practice, this primarily appeared to be a concern if the chair was not a researcher at all).
15. There has been a lack of geographical and institutional representation. In one case 8 panel members of a single GRP came from the same University.

These issues were raised with the NHMRC previously and have received acknowledgement. In some cases, I am aware of effective resolution; in others, I am not. I believe these issues to be sufficiently serious that they could impact the quality of peer review. In a democracy, it is important that processes not only provide natural justice, but are seen to do so. Unfortunately, where outcomes have been studied for the NHMRC Project scheme¹, only 60% of NHMRC Project applications are robustly characterized as unfunded, while of the remaining 40%, only a little over half were actually funded. In other words, there is currently a large random element to the process. Because of the heavy dependence of researcher’s careers on Category 1 funding, a large random element in grant award is likely to result in a large degree of personnel wastage of highly trained and highly productive research staff.

It is my view that Professor Graves’ work on the validity of outcomes of NHMRC peer review is important, but I think that the structures and processes involved also need to be reviewed. While I understand that the NHMRC must be responsive to the Auditor General’s Report 2009-10, it must also be responsive to democratic expectations of representation, fair play and natural justice. It is possible that a review of peer review structures and processes could provide creative solutions to some of the concerns raised by the Auditor General, while also improving outcomes.

It is not my intention to provide my own review of the NHMRC review processes; only to provide enough information to encourage the recommendation of a formal review. Given the underlying importance of review structures, processes and outcomes to the NHMRC’s responsibilities to foster medical research in Australia, I urge the Committee to consider making such a recommendation.

Yours sincerely,



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¹ [Graves, Nicholas, Barnett, Adrian G.](#), & Clarke, Philip (2011) Funding grant proposals for scientific research : retrospective analysis of scores by members of grant review panel. *British Medical Journal*, 343(sep27), d4797.