



Association for Academic Pathology

Promoting Excellence In Academic Pathology

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Association for Academic Pathology's Response to Request for Information:

Proposal to Cap the Number of Simultaneous Research Project Grants per Principal Investigator to Support More Researchers and Maximize Scientific Productivity and Innovation
Notice Number: NOT-OD-26-086

Submitted on 8/2/2026 on <https://rfi.grants.nih.gov>

Pros and Cons of Policy

Pros: AAPath supports increasing opportunity for early-career investigators and enhancing public benefit. Cons: Equally counting all funding mechanisms undermines these goals. Smaller short-term exploratory grants (e.g. R21, R03) would be counted similarly to R01 or P grants, discouraging application to smaller grants intended to collect preliminary data for higher risk/high reward projects, and adversely affecting discovery and innovation.

The optimal number of RPGs for the cap (2,3 or 4) (41 characters with spaces, limit 50)

AAPath does not support any cap for RPGs.

Strengths and weaknesses of the proposed implementation strategies

PIs are not interchangeable – this strategy to meet a cap is a significant weakness. Suitable replacements may not exist, thus discouraging new grant applications or prompting inappropriate PI substitutions or prematurely ending existing projects. Any new policy should only be implemented after careful piloting and study, and should be phased to cause the least disruption to investigators and institutions.

Possible unintended consequences or policy loopholes

Fewer grants for experienced PIs would eliminate many mentorship opportunities, damaging the scientific pipeline. Counting multi-PI grants similarly to single PI grants will discourage collaboration, adversely affecting the research enterprise and ultimately leading to less benefit to the people of our nation.

Other Comments

Association of Academic Pathology (AAPath) is a non-profit society that serves as the voice of academic departments in the U.S. and Canada. AAPath provides leadership and advocacy, enabling departments to fulfill their missions in education, research, and clinical practice.

Pathology departments at US medical schools examine cause and source of disease clinically and via experimental and translational research. One of the highest recipients of NIH grant funding in 2025 (\$840M) per Blue Ridge Institute, Pathology is ranked 6th of 44 medical disciplines, exceeding larger specialties such as surgery. Research in pathology departments is therefore of critical importance to health of Americans. AAPath provides a unique perspective from these departments. The proposed restrictions could threaten our population's health, as well as our national security.