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February 11, 2021

Norman E. Sharpless, MD
Director, National Cancer Institute
National Institutes of Health
Notice: NOT-CA-21-027
37 Convent Drive
Bethesda, MD 20814

Submitted via email to ncik08surgeon_rfi@mail.nih.gov

Re: Request for Information (RFI): Inviting Comments and Suggestions on the Surgeon-Scientist effort requirement on K08 awards from the National Cancer Institute [NOT-CA-21-027]

Dear Dr. Sharpless,

The American Urological Association (AUA) appreciates the opportunity to provide comments and suggestions on the surgeon-scientist effort requirement for K08 awards from the National Cancer Institute (NCI) and supports the reduction in effort required for these awards. The AUA is a globally engaged organization with more than 22,000 members practicing and conducting research in more than 100 countries. Our members represent the world's largest collection of expertise and insight into the development and treatment of urologic disease. Of the total AUA membership, more than 15,000 are based in the United States and provide invaluable support to the urology community by fostering the highest standards of urologic care through education, research, and the formulation of health policy.

As such, we will provide comments on the following questions in the RFI:

1. Is 50% effort sufficient for active surgeon-scientists to succeed in their research and career development activities under the K08?
2. If a minimum 75% full-time effort requirement were to remain for all surgeon-scientists, would your institution be willing to grant you this level of protected time or would this preclude you from applying for the NCI K08?
3. Should there be a uniform effort requirement for all surgical specialties/subspecialties? Are there exceptions to the rule for certain surgical specialties/subspecialties?



To ensure that AUA perspectives on these questions would be well-informed by active surgeon-scientists, we conducted a survey of 200 early-career and established surgeon-scientist AUA members. Our perspectives below represent their collective viewpoints.

The AUA believes a 50% effort is sufficient for active surgeon-scientists to succeed in their research and career development activities under the K08.

The National Institutes of Health's (NIH) 2014 Physician-Scientist Workforce Working Group report noted a steady decline of 27% surgeon-scientists pursuing research careers from 2007-2014. In response, the NCI has taken steps to make K08s more attractive to physician-scientists and notes that more needs to be done to recruit surgeon-scientists. As such NCI has allowed urology surgeons to have a minimum 50% effort on their research and career development activities under K08 grants. The AUA survey, as noted above, revealed that most surgeon-scientists were only able to apply, and receive, K08 grants because of the 50% exception. Many AUA surgeon-scientists who were awarded K08 grants at a 50% effort have become successful NIH-funded translational science investigators, which addresses a major need in moving research discovery into clinical practice. These urology surgeon-scientists attribute many of these successes to the K08 programs in which they were able to maintain an equal balance between clinical work and research.

Despite the changes that NCI has implemented with respect to urology surgeons, the AUA remains alarmed that more progress has not been made to support surgeon-scientists whose discoveries have revolutionized the medical field. Further, surgeon-scientists offer a unique perspective to research due to their hands-on experience with patients. An article published in *Nature Reviews Urology* noted that the decline in surgeon-scientists has been accelerated by the "need for clinical productivity and burdensome administrative responsibilities. A pathway forward is needed, to protect and nurture the surgeon-scientist — a critical participant in academic medicine."¹

One way in which to increase the number of surgeon-scientists applying for K08 awards is by lowering the percent effort required under the current NCI eligibility requirements for all surgeon-scientists *and clearly communicating that change to potential grantees and their institutions*. A decrease from 75% effort to 50% effort would enable more surgeon-scientists to pursue a successful research career. Our research showed that urology surgeon-scientists are unanimous in the perspective that a 50% level of effort is not only sufficient but ideal in providing the flexibility to design research projects that not only complement surgical practice, but also address patient needs and provide for important advances in the understanding of urologic cancers toward improving prevention, detection and diagnosis, and treatment. Further, surgeon-scientists supported by 50%-effort career

¹ Woldu, S., Raj, G. The surgeon-scientist — a dying breed?. *Nat Rev Urol* 13, 698–699 (2016). <https://doi.org/10.1038/nrurol.2016.236>



development grants have been able to progress to R01-level funding. Therefore, it is paramount to the future of research, and surgeon-scientists, to have attractive early-career funding programs that allow for balance between maintaining both surgical proficiency and research career development.

The AUA believes that if a minimum 75% effort requirement remains for all surgeon-scientists, many institutions will continue to be unwilling to grant this level of protected time, thereby precluding many strong candidates from applying for the K08.

The current NCI requirement of 75% effort precludes many talented surgeon-scientists from applying for K08 grants due to lack of institutional support. Urology surgeon-scientists reported that it is “not likely” that surgeons can allow for 75% protected time and continue to maintain a viable surgical practice. They added that, in the unlikely case that an institution will allow them that much time, 25% is not sufficient to properly fulfill their clinical duties. It is also too little time for a surgeon-scientist to maintain necessary clinical and surgical skills, as techniques such as working with robotic surgery equipment require ample practice and a substantial patient load.

The AUA believes that the NCI must decrease the full-time effort requirement from 75% to 50% in order to encourage talented surgeon-scientists to apply for research career development grants. Institutional support is critical to a surgeon-scientist's career, and any surgeon that does not have it will be much less likely to succeed in either research or practice. A 75% effort level for research provides only 25% effort for clinical practice, which would create an imbalance detrimental to the surgeon-scientist's unique ability to translate hands-on experience of clinical needs into research activities that will ultimately improve patient care. Further, it is unrealistic for surgeon-scientists to dedicate only 25% effort in the operating room and clinic and still provide the high quality of care needed for their patients.

The reasons above have likely played a role in the 27% decline of surgeon-scientists who choose to pursue research careers. To that end, urology surgeon-scientists believe that a 50% effort would be broadly supported by their institutions, and that such a reduction would allow them and future grant recipients to devote generous time to their research without sacrificing the needs of their institutions or the welfare of their patients.

While the AUA cannot speculate over other subspecialties and their efforts, we believe that, in the field of urology, a 50% effort is sufficient.

Urology surgeon-scientists, compared to other sub-specialties, are required to spend more time in their clinical responsibilities, due to long hours in the operating room as well as clinical visits. This includes urologic cancers (prostate, bladder, and kidney) that require



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treatment and follow up for many years. Thus, with the need for urology surgeon-scientists to have surgery days **and** clinic days to meet with their patients, it is not feasible for most urologists interested in pursuing research careers to do that with a 75% effort requirement for their research. Urology as a surgical specialty is one that involves both medical and surgical management. However, urology surgeon-scientists surveyed unanimously believed that a 50% effort would be sufficient for successful progress in both the conduct of research as well as research career development and maintenance of optimal surgical proficiencies and clinical patient care.

Therefore, the AUA strongly supports lowering the effort requirement for the NCI K08 Career Development Award to 50% for early-career surgeons pursuing support for their developing research careers as well as new research to help their patients. We are grateful to the NCI for this opportunity to provide these perspectives.

Sincerely,

Handwritten signature of Aria F. Olumi in black ink.

Aria F. Olumi, M.D.
Chair, Research Council

Handwritten signature of Toby C. Chai in black ink.

Toby C. Chai, M.D.
Chair, Research Advocacy Committee