FASEB
Federation of American Societies for Experimental Biology

Representing Over 110,000 Researchers

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May 2, 2023

Lawrence A. Tabak, DDS, PhD
Performing the Duties of the NIH Director
Building 1, Room 126
1 Center Drive
National Institutes of Health
Bethesda, Maryland 20892

Comments submitted electronically via lawrence.tabak@nih.gov

Dear Dr. Tabak,

Federation of American Societies for Experimental Biology (FASEB), representing 26 scientific societies and over 110,000 individual biological and biomedical researchers, applauds the objectives and goals set out in the fiscal years 2023 – 2027 NIH-Wide Strategic Plan for Diversity, Equity, Inclusion, and Accessibility (DEIA). The thoughtful plan demonstrates NIH's commitment to integrate DEIA principles and actions into all programs, policies, and processes internally, as well as usher best practices for implementation in the broader biomedical and behavioral research enterprise.

Accessibility and Mitigating Bias

FASEB commends NIH's recent efforts to better support scientists with disabilities and mitigate bias in the workplace—both further emphasized in the strategic plan. We previously endorsed key recommendations from the NIH's Advisory Committee to the Director Working Group on Diversity, Subgroup on Individuals with Disabilities, and continue to strongly encourage NIH to implement these suggestions. Additionally, we look forward to implementation of the proposed simplified review criteria, and are particularly excited about the changes aimed to reduce reputational bias of the investigator(s) and their institution(s). Similarly, proposed revisions to fellowship review have the potential to mitigate bias, possibly leading to supporting more diverse early-career scientists.

Workforce Data

NIH's Internal Workforce

As previously noted, FASEB is appreciative of NIH's enhanced efforts to be transparent about its own workforce data. We hope to see this commitment continue with at least annual updates to publicly available demographic statistics. Furthermore, disaggregation of data by step promotion within grades and occupation in greater detail than "scientific," "health and research," and "infrastructure" may reveal exemplars to be models for the other Institutes and Centers as well as the scientific research community at large.

Data on NIH Applicants and Awardees

Recent analyses of funding rates by demographic categories for research project grants and K awards are greatly appreciated and useful for crafting data-driven policy recommendations. As NIH explores creating dynamic, interactive dashboards, FASEB encourages updates to RePORT to allow stakeholders to view aggregate trend data by demographic categories for applicants and awardees.

Measures of Productivity

Objective 3.1, goal 3, strategy 1 of the strategic plan describes NIH's intent to identify and promote the application of measures of productivity aside from the typical metrics that better reflect the full depth and breadth of the workforce. Current measures of productivity, such as publications and patents, are extremely narrow and neglect the human aspect and curiosity driven nature of research. FASEB is excited about the prospect of expanding tools to measure productivity. As mentioned in the strategic plan, evaluations of training and mentoring interventions may prove valuable in identifying effective approaches to attract and retain talented individuals from diverse backgrounds. Assessing successful training by valuing the wide variety of career pathways available would also be a welcome shift in the status quo. Novel measurements of productivity should further bolster our understanding of the value and impact of diverse teams and inclusive workplace environments on research findings.

Measuring DEIA Progress

Internally, NIH's racial and ethnic equity plans show promise to identify areas of improvement and hold leadership accountable for taking action to address pressing issues. Upholding NIH's commitment to clear, transparent communication about its actions, progress, and results, FASEB looks forward to more information about the implementation and progress made as a result of these plans. Additionally, if shown to be useful at NIH, racial and ethnic equity plans may be a promising practice for institutions. Sharing de-identified racial and ethnic equity plans, or an example plan, with external stakeholders may be fruitful in influencing positive change across the entire ecosystem. As NIH identifies best practices, widespread communication for external uptake is critical.

Expanding Official Policies to Include LGTBQIA+ Scientists

NIH's commitment to enhancing diversity detailed in the strategic plan includes individuals of all sexual orientations and gender identities. The strategic plan also acknowledges the existence of the sexual and gender minority (SGM) community. NIH has invested in SGM research projects, and has elevated the importance of addressing SGM-related health and workforce issues through the Sexual and Gender Minority Research Office. However, within NIH's own workforce in 2019, SGM individuals were more likely to experience sexual harassment and therefore more likely to experience feelings of isolation and job dissatisfaction. Despite recognizing this population as a minority in a research context and knowing these individuals are vulnerable to sexual harassment, researchers themselves who identify as LGBTQIA+ are not recognized as a minority population in the official Notice of NIH's Interest in Diversity. This limits funding opportunities, such as diversity supplements, due to eligibility restrictions. National Science Foundation will begin collecting sexual orientation and gender identity data in the 2024 cycle of the Survey of Earned Doctorates, providing much needed national landscape information on SGM doctorate recipients. FASEB encourages NIH to utilize this information to implement an evidence-based update to its Notice of Interest in Diversity to be more inclusive of additional historically excluded populations.

FASEB is grateful for the thoughtful attention in the strategic plan that quantitative data and collecting evidence of lived experiences are not enough—data must be analyzed in a manner that elucidates barriers, highlights successes, and results in actionable opportunities for change. Progress also needs to be measured, and it is clear that NIH intends to identify useful evaluations and share those best practices broadly. Overall, the strategic plan contains important goals for advancing DEIA throughout the entire scientific ecosystem, and FASEB looks forward to future advancements in inclusive excellence.

Sincerely,

Kevin C. Kregel, PhD
FASEB President

Cc: Julie Broussard Berko, Marie A. Bernard, MD, and Kevin D. Williams, JD, co-chairs of the NIH-Wide Strategic Plan for DEIA Working Group