



January 17, 2025  
Suzanne H. Plimpton  
Reports Clearance Officer, National Science Foundation  
2415 Eisenhower Avenue, Suite E6400  
Alexandria, Virginia 22314

**FASEB comments Regarding NSF's Intent to seek approval to extend an information collection for Survey of Doctorate Recipients for three years.**

Submitted electronically via email: [splimpto@nsf.gov](mailto:splimpto@nsf.gov)

Dear Ms. Plimpton,

The Federation of American Societies for Experimental Biology (FASEB) appreciates the opportunity to comment on the proposed renewal of the National Science Foundation's (NSF's) Survey of Doctorate Recipients (SDR), published in the [Federal Register](#) on December 5. With support from the National Center for Science and Engineering Statistics and the National Institutes of Health, the SDR results provide unique and valuable data on careers of U.S.-trained science, engineering, and health (SEH) doctoral scientists including information on their training, experience, salary and career development. Thus, SDR analysis is crucial to understanding PhD employment outcomes and trends over time creating opportunities for policies to be data driven and adapt to address the needs of researchers in an evolving scientific workforce ecosystem and essential to support NSF's commitment to broadening participation.

Echoing comments in response to prior renewals of [SDR](#), the Survey of Graduate Students and Postdoctorates in Science and Engineering and the [Survey of Earned Doctorates](#), FASEB is eager to see demographic information collected in the SDR more accurately reflect identities of the research population. Including additional metrics, such as expanding sex to accommodate options beyond the traditional male and female binary, will allow evaluation of SDR data to highlight personal identities and intersectionality. The ability to disaggregate data through more granular identities will be vital to understand engagement of historically excluded groups in the highly trained scientific talent pool and the success of efforts to broaden participation in STEM fields.

FASEB eagerly awaits the implementation of recommendations outlined in the [Sexual Orientation and Gender Identity \(SOGI\) Working Group](#) reports, including [best practices for collecting SOGI data](#) and [updates to SOGI terminology](#). FASEB encourages NSF and the SOGI Working Group to act swiftly on these recommendations and prioritize timely updates to NSF-issued surveys. As best practices evolve through continuous learning, collecting data on

marginalized scholars is essential for developing policies and practices that foster inclusive and equitable environments. NSF has the opportunity to lead and set standards for data collection that emphasize identity and intersectionality, thereby enhancing our understanding of the dynamic workforce ecosystem.

Sincerely,

A handwritten signature in black ink that reads "Beth A. Garvy". The signature is written in a cursive style with a large, looping "G" at the end.

Beth A. Garvy, PhD

FASEB President