FASEB
Federation of American Societies for Experimental Biology

Representing Over 130,000 Researchers

301.634.7000
www.faseb.org

9650 Rockville Pike
Bethesda, MD 20814

May 6, 2020

Suzanne H. Plimpton
Reports Clearance Officer
National Science Foundation
2415 Eisenhower Avenue
Suite 18200
Alexandria, VA 22314

Submitted electronically via email: 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 Survey of Graduate Students and Postdoctorates in Science and Engineering, published in the *Federal Register* on April 6. Information provided by this survey on demographics and financial support mechanisms of master's and doctoral students, postdoctoral scientists, and other doctorate-holding non-faculty researchers is a valuable assessment of the current scientific workforce. The National Science Foundation's (NSF's) mission of promoting progress of science is dependent upon a diverse and well-trained scientific workforce. Furthermore, data collected and resulting analysis will support NSF's commitment to broadening participation.

Currently, data collected appear to be somewhat limited. For example, sex only lists male and female. Although the value of longitudinal data collected in an identical manner is understood, several National Academies of Science, Engineering, and Medicine (NASEM) and National Research Council (NRC) reports[1,2,3,4] have called for enhanced categorical data. Specifically, the NASEM report on addressing the underrepresentation of women in science, engineering, and medicine issued earlier this year emphasizes the lack of data for individuals with intersecting identities.

[1] NASEM (2020). "Promising Practices for Addressing the Underrepresentation of Women in Science, Engineering, and Medicine: Opening Doors." Accessed on April 17, 2020.
[2] NRC (2013). "Seeking Solutions: Maximizing American Talent by Advancing Women of Color in Academia: Summary of a Conference." Accessed on April 17, 2020.
[3] NASEM (2018). "Sexual Harassment of Women: Climate, Culture, and Consequences in Academic Sciences, Engineering, and Medicine." Accessed on April 17, 2020.
[4] NRC (2006). "To Recruit and Advance: Women Students and Faculty in Science and Engineering." Accessed on 17 April, 2020.

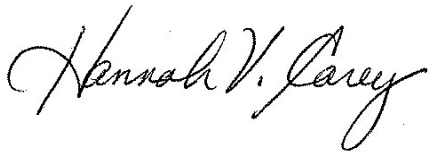
Similarly, the presentation of the key findings from the National Institutes of Health (NIH) Workplace Climate and Harassment Survey noted that vulnerable populations—such as individuals with nonbinary gender identities—often have a small sample size, but represent an important segment of the biological and biomedical workforce. To serve these individuals we must first collect data to know who these scientists are and better understand their experiences. Accordingly, the NIH Anti-Harassment Steering Committee proposed collecting demographic data, including sexual orientation and gender identity, on individuals who report harassment.

The scientific workforce and ecosystem have evolved since the initiation of the Survey of Graduate Students and Postdoctorates in Science and Engineering. Therefore, NSF may want to consider updating data collected to better represent the contemporary issues of graduate students and postdoctoral scientists. FASEB acknowledges that such updates will not occur swiftly and will require additional effort by responding organizations. Similarly, disclosure of any identity by an individual is voluntary and thus comes with the caveat of being incomplete. However, as very little data for these vulnerable populations exists, any increase in quantitative data will prove valuable.

Administrative burden is a long-standing issue of concern for FASEB, and excessive hardship on institutional coordinators tasked with reporting this data should be avoided. To reduce administrative burden associated with responding to the survey, NSF may want to re-examine the survey infrastructure and critically assess the user interface for ease of user experience. FASEB acknowledges that thoughtful redesign of demographic data collected by institutions would require concerted effort and increased workload at the outset. However, following updates of data collection methods and questions, subsequent years effort should be reduced and not represent significantly more work than is already tolerated for the current survey. Combined with infrastructure updates to promote user friendliness, the benefits of available intersectional data will far outweigh the initial increased burden of data collection redesign and reporting.

By undertaking an effort to expand data collected NSF can be the standard bearer and usher academia into a new era of disaggregated data that accounts for multiple intersecting identities. Additional granular data will improve our understanding of the current research environment.

Sincerely,



Hannah V. Carey, PhD
FASEB President