



FASEB

Federation of American Societies
for Experimental Biology

Representing Over 130,000 Researchers

P.O. Box 2288, Rockville, MD 20847 | faseb.org

February 2, 2021

Advisory Committee to the Director
National Institutes of Health
c/o Gretchen Wood
One Center Drive, Room 126
Bethesda, MD 20892-0147

Submitted electronically via email: woodgs@od.nih.gov

Dear Committee Members,

The Federation of American Societies for Experimental Biology (FASEB) was disappointed by the lack of substantive updates on key issues pertaining to safe environments and fostering independence of early career researchers during the December meeting of the National Institutes of Health (NIH) Advisory Committee to the Director (ACD). Training and career development of early career researchers is of utmost importance to the over 130,000 individual scientists represented by FASEB's 29 biological and biomedical scientific member societies. As such, the Federation looks forward to hearing updates on essential NIH projects like the Next Generation Researchers Initiative and Changing the Culture to End Sexual Harassment. Overarching topics within these initiatives, as well as implementation of individual recommendations such as restorative justice, an analysis of salary support, and more, are vital to ensuring a skilled biological and biomedical workforce. Therefore, FASEB was discouraged by the lack of engagement on these topics during the most recent ACD meeting, especially considering the minor updates presented during the June 2020 ACD meeting.

We are sympathetic to the fact that working during a global pandemic creates less than ideal circumstances for the project staff and volunteer leaders. However, continued community engagement on issues for which transparency is vital is required to build trust and awareness of project challenges and progress. FASEB looks forward to substantive updates on topics pertinent to trainees, specifically regarding implementation of the recommendations from the Changing the Culture to End Sexual Harassment and Next Generation Researchers Initiative Working Groups during the June 2021 ACD meeting and through avenues such as the Open Mike and Under the Poliscope blogs.

Changing the Culture to End Sexual Harassment

Support for Progress, but Missed Opportunities to Update Stakeholders

It was starkly noticed that there was no presentation from the Working Group on Changing the Culture to End Sexual Harassment during the December 2020 ACD meeting. Clarifying [language](#) in the NIH Grants Policy Statement indicating that NIH should be notified if a requested change in

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Principal Investigator (PI)/key personnel or recipient institution is related to concerns of harassment is [appreciated](#) and hopefully makes a meaningful impact. However, since this was presented during the June 2020 ACD meeting the public is unaware if NIH has seen any positive changes due to this update. During prior ACD meetings the Working Group has presented high-level data on the number of cases reported to NIH, the number of institutions involved, and an overview of outcomes. FASEB has appreciated this practice. However, there has been a lack of data sharing since June 2020. Making data and outcomes readily available is key to building trust in the community. The [Final Report](#) from the Working Group emphasizes transparency, and NIH plays a critical role in upholding this value.

Also during June 2020, NIH [shared](#) the process for handling allegations of sexual harassment for individuals on an NIH-funded project or at an extramural NIH funding recipient institution. Publishing these procedures is valuable in creating transparency and building trust, and FASEB commends this work.

Nevertheless, it is important to recognize that a vast majority of victims, even those [employed at NIH](#), may not report incidents of sexual harassment. Given the unfavorable societal climate around harassment, victims are likely still hesitant to report and may be waiting to see how NIH handles the initial cases. Continued data sharing may be key for victims to help determine their course of action.

Improvements in Transparency for Potential Reporters of Harassment

More could be done to foster confidence in NIH's current reporting system. As [previously noted](#), typically a named complainant is required for an official adjudication process to occur; therefore resources associated with NIH's reporting system must clearly communicate to a potential anonymous reporter what outcome they can expect. The [web form](#) for extramural complaints, as well as the What to Expect When Notifying NIH [page](#), provides little information other than the disclaimer that confidentiality cannot be guaranteed. Ease of use and transparency of information should also be considered. Although the Anti-Sexual Harassment Policy and Compliance [webpage](#) contains quality content, much of it is difficult to find. For example, all of the data shown in prior ACD meetings can only be accessed through links in the [Related Statements section](#), and that is only if the user knows that the data would be contained in the ACD presentations. Furthermore, the June 2020 ACD presentation is not included on this webpage. When considering a general victim of harassment, it is reasonable to think they may not know the inner workings of ACD and understand data are contained in these presentations. Without easily accessible data, the average user may have no statistics available to aid in their decision-making process. If transparency is truly a goal, the web form or home page of the Anti-Sexual Harassment Policy and Compliance section could serve victims better if it included a dashboard highlighting data.

Implementation of Working Group Recommendations

As the Working Group moves forward with implementation of the recommendations, FASEB maintains that NIH should consider policies to help those who may not have an official finding. As the Final Report acknowledges, there is often deep distrust in working with a Title IX Coordinator through an official process. Nevertheless, harm can occur without an official finding. Additionally, NIH can act as a standard bearer by requiring all members of research groups supported on NIH funds to take professional conduct training. The Federation was pleased to see NIH [expand](#) required intramural harassment training to all NIH employees, trainees, fellows, and contractors; we hope similar pressure can be applied to the extramural community. NIH's advancement in ending sexual

harassment is commendable, but there is still more to achieve. FASEB has joined with other scientific societies in the [Societies Consortium on Sexual Harassment in STEMM](#) to encourage uniformity in effort across societies and lead as standard bearers in their respective fields. Initiatives such as [STEMM Equity Achievement Change](#) are also helping to push the boundaries. However, as a primary funding agency NIH ultimately has immense influence over the university landscape, and the Federation encourages NIH to act swiftly to promote change.

Creating and maintaining safe training environments is a pillar of the Final Report. Further emphasizing safety, the [NIH Grants Policy Statement](#) asserts “NIH recipients are expected to provide safe and healthful working conditions for their employees and foster work environments conducive to high-quality research.” Despite understanding that PIs found in violation of an institution’s sexual harassment policy should not be training anyone, many institutions are still reticent to remove these individuals as PIs on a grant. FASEB is pleased that NIH has noticed the worrisome trend that the culture of “[superstar](#)” PIs being indulged by institutions, recognized within the Working Group’s Final Report, persists. The Federation implores NIH to develop a policy solution to this problem. If PIs are known to create environments unsafe for trainees, they should not be allowed to remain PI on a grant.

Theme 2, Establish Mechanisms for Restorative Justice, of the Final Report puts forth recommendations for NIH to engage in practices of restorative justice including new funding opportunities, development of institutional safe-harbors, and additional research on restorative justice practices tailored to the biomedical community. FASEB acknowledges this undertaking is a lofty goal that requires careful consideration. Currently, there has been no update on NIH’s evaluation and process regarding implementing restorative justice with the intramural or extramural communities. Apprising stakeholders of considerations regarding restorative justice implementation would be valued.

COVID-19 Considerations

The coronavirus pandemic has changed the work landscape for scientists in dramatic ways. Power dynamics are arguably amplified during this time of heightened stress. While day to day in-person microaggressions creating hostile environments may be less prevalent during this time of decreased access to laboratory facilities, harassment certainly persists in other forms. FASEB appreciates the urgency with which NIH is addressing the COVID-19 pandemic, but the focus on harassment cannot be subverted.

Next Generation Researchers Initiative

NIH, including individual Institutes and Centers, has provided an incredible level of flexibility during the pandemic. FASEB is thankful for these endeavors. Although the Federal government is often chided for being slow to act, NIH managed to address sweeping issues related to the pandemic with swift efficiency, which did not go unnoticed or unappreciated. In particular, the vast amount of no cost extensions and small but meaningful amount of paid extensions to K and F awardees shows NIH’s commitment to retain the current generation of early career researchers due to factors well beyond any individual researcher’s control. FASEB was also delighted by the [webinars](#) organized by National Institute of General Medical Sciences primarily for a trainee audience.

New Initiatives: Katz Award & Loan Repayment Program

The focus on Early Stage Investigators (ESIs) generated by the Next Generation Researchers Initiative thus far has been impressive. FASEB is enthusiastic about the [Stephen I. Katz Early Stage Investigator Research Project Grant](#) (Katz awards). This funding mechanism encourages novel lines of scientific inquiry and fosters independence in new areas of research. Given that many ESIs have been unable to be in the laboratory full-time due to the pandemic, this opportunity that bans preliminary data during submission is particularly timely. The Federation looks forward to updates regarding uptake of this grant opportunity. Additionally, while it is understandable that the initial phase of Katz awards will be a subset of ESI R01 grants, it would be advantageous if future Katz awards were in addition to other ESI R01s. Hopefully, NIH and other champions of basic research will have the opportunity to speak with Congressional leaders and secure supplemental funding for this innovative grant mechanism.

Similarly, the Federation is eagerly awaiting the release of the Research on Emerging Areas Critical to Human Health [Loan Repayment Program](#) (LRP). Giving NIH Institutes and Centers the ability to determine their areas of research priority has the potential to create LRP eligibility for a wide array of basic biological and biomedical researchers. Reasonably, debt can be a large factor that may dissuade scientists from pursuing postdoctoral research and staying in academia overall. Expanded eligibility for the LRP is a riveting prospect.

Data on COVID-19 Impact

COVID-19 has had enormous impact on the biological and biomedical research community and FASEB values NIH's efforts to collect data on this matter. [Preliminary findings](#) from the surveys of institutional leaders and individual investigators shared during the December 2020 ACD meeting were appreciated. Attention paid not only to effects on research but also impact on mental health demonstrates NIH's dedication to supporting the whole scientist instead of only the science. FASEB looks forward to the final data analysis from the extramural surveys. While the pandemic has overarching themes affecting everyone, the Federation hopes to see the researchers survey data disaggregated when appropriate. For example, stressors that postdoctoral scientists and graduate students face may have significant differences from faculty challenges. If possible, we also hope to see an emphasis on intersectional identities aside from career stage during data analysis.

Administrative Data Enclave

The [Final Draft Report](#), presented in December 2018, includes several recommendations FASEB believes should be a priority. An enclave of administrative data proposed in Theme 5, transparency efforts and engagement with scientists to inform policy decisions, would prove to be an extremely valuable resource to inform policy decisions impacting the biomedical and biological workforce. FASEB [submitted comments](#) in response to the NIH [Request for Information](#) on an administrative data enclave, issued in March 2019. An update regarding whether NIH will be proceeding with such a resource would be much appreciated.

ESI Funding Data

FASEB applauds the emphasis on ESIs and would appreciate continued communication on these efforts. During the December 2019 ACD meeting, [data](#) were shown indicating that the number of ESI R01 awardees significantly exceeded the original goal of 1,100 and demonstrated very successful implementation of aspects of the Initiative. An update on the number of 2020 ESI R01 awardees would be welcomed.

Salary Support Analysis

Recommendation 2.9 of the Final Draft Report called for an analysis of salary support derived from NIH grants within one year. As the Report was released in December of 2018, we eagerly await an update on this vital issue. The growth of “soft money” in salary support is a [long-standing concern](#) for FASEB. Additionally, while salary support has been an issue of interest for years the pandemic has certainly exacerbated these concerns. Many trainee positions, especially postdoctoral appointments, rely heavily on soft money. The precarious financial situation many institutions of higher education find themselves in trickles down and affects trainees—not only their current and future job prospects, but also their wellbeing. Data on salary support is needed now more than ever to create fact-based policy arguments to support trainee career growth.

Transparency of Implementation Efforts

Ultimately, FASEB is grateful for the regular emphasis on trainee career advancement and safe working environments during ACD meetings. Therefore, we were frustrated by the complete lack of engagement on these issues during the December 2020 ACD meeting. The ACD is [charged](#) with making recommendations regarding program development and NIH policy. Ending sexual harassment and the Next Generation Researchers Initiative are key issues requiring ACD insights to accomplish their goals. An entire day of the December 2020 ACD meeting was dedicated to COVID-19 topics, with many presentations focused solely on the science as opposed to program development or policy. It is understandable that NIH wants to celebrate successes in these pandemic efforts but relegating so much time to this at the expense of crucial trainee issues is troublesome.

Transparency with external stakeholder in these efforts is vital to build trust and result in successful uptake of NIH initiatives in the extramural community. FASEB recognizes the immense amount of work initiatives such as restorative justice, an administrative data enclave, increasing trust from harassment victims, an analysis of salary support, and even more individual recommendations from the Next Generation Researchers Initiative and Changing the Culture to End Sexual Harassment Reports require. The behind-the-scenes effort from NIH staff and volunteer leaders to further these projects is commendable; however, notifying the broader community on developments and progress on these endeavors in a timely manner is critical. FASEB look forwards to robust engagement on trainee focused topics moving forward by any means appropriate, including blog posts, webinars, and presentations during the June 2021 ACD meeting.

Sincerely,



Louis B. Justement, PhD
FASEB President