FASEB
Federation of American Societies for Experimental Biology

Representing Over 130,000 Researchers

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

Submitted electronically via email: cyndi.burrus-shaw@nih.gov

Dear Committee Members,

The Federation of American Societies for Experimental Biology (FASEB), representing 30 scientific societies and over 130,000 individual scientists, was encouraged by the substantive spotlight on diversity, equity, and inclusion (DEI) efforts at National Institutes of Health (NIH) during the December 2021 Advisory Committee to the Director meeting. Thoughtful priority areas were highlighted to advance equity for all biological and biomedical scientists.

Intramural Actions & Best Practices
Every NIH Institute and Center (I/C) Director will be accountable for DEI efforts through the newly implemented racial and ethnic equity plan at each I/C. This practice of identifying focus areas and tracking progress toward meeting goals creates measurable metrics to evaluate over time. Once initial racial and ethnic equity plans are finalized, it would be beneficial to share these with the extramural research community as a model of best practices to follow. Furthermore, in the spirit of the T Committee on transparency and communication, FASEB recommends that the annual progress reports and updates to each I/C's racial and ethnic equity plans be shared with the extramural community.

Similarly, an intramural toolkit on the UNITE initiative and ending structural racism was recently launched. If much of the content is widely applicable to those outside NIH, it would be helpful to release the information for use by extramural stakeholders.

The newly launched data dashboard webpage serves as an aggregator of existing diversity data. FASEB is grateful for the attention to ease of user experience by harmonizing previously disparate data sources. Currently, the data dashboard is a static site; FASEB looks forward to the evolution of this project into a dynamic data dashboard.

Impact External Community
The E Committee presented several priority areas and recommendations of interest.

Promoting Extramural Institutional Culture Change
The proposed Excellence in DEI Investigator's Grants and prize for institutional innovation and advancement in DEI are exciting prospects to encourage cultural change and reward scientists for their high-quality work—both DEI efforts and scientific research. It is difficult to determine if institutional culture has changed without routine measurements, which makes the recommended program to provide support for institutions to conduct objective climate assessments exciting. FASEB has previously recommended NIH enhance communications to spur

widespread adoption of the 2019 intramural workplace climate and harassment survey. Echoing prior themes, FASEB encourages strong collaboration between UNITE volunteers and the NIH Chief Officer for Scientific Workforce Diversity (COSWD) staff invested in employing climate surveys to assess change.

Additionally, beyond simply surveying climate and culture, it is vital that information collected is used to improve equity and inclusivity. Therefore, as NIH develops actionable steps through each I/C's racial and ethnic equity plans and COSWD initiatives, broadly promoting these to the extramural community may spark culture change throughout biological and biomedical sciences environments. Furthermore, partnership with external stakeholders, such as the American Association for the Advancement of Science STEMM Equity Achievement (SEA) Change program, may catalyze uptake by the extramural community. Integration into university and departmental culture will be key, and partnering with initiatives like SEA Change and professional scientific societies that act as standard bearers in the field may be critical for success.

Opportunities to Change NIH Processes and Policies in Extramural Funding

Several NIH processes pertaining to peer review were also highlighted as ripe for change. NIH's Center for Scientific Review (CSR) has recently implemented bias training for reviewers and scientific review officers (SROs), established a reporting mechanism for concerns pertaining to fairness and bias in peer review, and taken efforts to diversify review panels. FASEB applauds recent updates to bias training that calls attention to the role of the Chairperson to mitigate implicit bias. Instructions to reviewers to actively challenge potentially harmful assumptions, such as university reputation impacting the ability of the applicant to complete the proposed science, are also laudable. As efforts to reduce bias continue, FASEB encourages NIH to further engage with Chairs, as they have the opportunity and responsibility to intervene in real time, prior to scores being affected and in ways SROs cannot, when biased statements are made.

Impact of these implicit bias training initiatives may be difficult, but important, to measure. FASEB appreciates the transparency of CSR data pertaining to reviewer and SRO demographics, and urges implementation of evaluations that are deemed appropriate to measure the effect of implicit bias training. Additionally, feedback to reviewers could be provided about their spoken and written contributions; particularly underscoring the utility of reviewer comments to program officers and applicants. CSR's focus on integrity of the review process is critical, and publishing high-level data on number of reported concerns pertaining to fairness and bias during peer review may be a first step in assessing the pervasiveness of implicit bias and the effectiveness of proposed actions to reduce bias in extramural funding.

Additionally, the Early Career Reviewer (ECR) Program has proven extremely popular due to the value of Assistant Professors being fully immersed in the peer review process. Since early career faculty tend to be more diverse than those in senior faculty ranks, it may be prudent for UNITE and CSR to work together to grow the ECR Program to meet demand. Additionally, NIH should explore the possibility of expanding the ECR Program, or creating a parallel program, to include scientists from all historically excluded backgrounds, regardless of career stage. Successful grant applications should help with retention, therefore leading to increased faculty diversity. Furthermore, decreasing possible sources of institutional and reputational bias during peer review by altering the manner with which the Environment and Investigator sections are reviewed has promise; FASEB looks forward to the implementation of a pilot and analysis of preliminary outcomes. Overall, congruency between CSR and UNITE recommendations and actions may establish an effective partnership in reducing bias during peer review and retaining talented faculty.

Enhance Research Capacity at Minority-Serving Institutions

Building and sustaining research capacity at minority-serving institutions (MSIs) is a laudable goal. Expanding the Research Centers in Minority Institutions Program may prove powerful. Furthermore, creating funding opportunities to support MSIs, such as training grants and S10 instrumentation grants, may be critical resources

to foster retention of students in STEM fields and ultimately impactful in diversifying the scientific workforce. FASEB is invested in promoting shared research resources, and the S10 instrumentation program for MSIs is an excellent example of implementation of recommendation 1, create better business models for shared resource facilities, and recommendation 2, enhance funding programs that support facilities, from FASEB's Maximizing Shared Research Resources report. We look forward to an emphasis on shared research resources as a method to build research capacity at MSIs.

However, administrative burden remains a key concern. Many MSIs and other smaller universities do not have dedicated staff to assist with the complexities of grant preparation, submission, and post-award management. Administrative support for limited-resourced institutions provided through expansion of the sponsored programs administration development grants program or other activities is critical. It would be a laudable goal to elevate MSIs to R1 status, which may be possible with additional NIH support to bolster grant infrastructure at MSIs. Furthermore, NIH must be prudent in assuring awards do indeed help institutions that are not already well-resourced. Funding mechanisms that encourage collaboration between highly resourced institutions and MSIs must ensure that the role the MSIs serve is an integral part of the science being proposed and a true partnership between universities, rather than the well-resourced institution taking majority of the funding and largely excluding MSI faculty and trainees from opportunities grant funding offers. Additionally, many research-intensive universities have goals of becoming MSIs in the upcoming years, but are already classified as highly resourced institutions. These institutions can be simply minority enrolling, due to the local population demographics in their geographical location, instead of genuinely minority serving. Additional parameters on funding opportunity announcements, or considerations during peer review, beyond the MSI designation may be necessary to diversify awardee universities and support the next generation of scientists.

Need for Additional External Stakeholder Engagement

FASEB is grateful for continued engagement on the topic of racial and ethnic equity beyond the March 2021 Request for Information (RFI) to listening sessions aimed at various stakeholder groups through early 2022. However, thus far, input from the extramural community has been limited to high level topics, rather than discussion of UNITE Committee recommendations and implementation plans. The extramural community has little representation on the UNITE Committees; therefore, as recommendations are crafted and implementation plans are drafted, it is crucial to involve the voices of those who will be most impacted by proposed changes.

Expand Actions to All Dimensions of Diversity

A key theme revealed in the preliminary findings from the March 2021 racial equity RFI was to expand UNITE to be inclusive of all dimensions of diversity to incorporate other historically excluded racial and ethnic groups, and factors beyond race and ethnicity such as disability, socioeconomic status, geographical region, gender, and more, with a focus on intersectionality. FASEB echoed this sentiment in response to that RFI. Outside of UNITE, NIH embraces this ethos. The publicly available intramural workforce data, BRAIN initiative plan to enhance diverse perspectives, and forthcoming NIH-wide diversity, equity, inclusion, and accessibility strategic plan all incorporate aspects of diversity beyond the limited scope of the UNITE initiative. FASEB appreciates NIH's direct acknowledgment of structural barriers and challenges faced by Black and African American scholars. However, to achieve the ultimate goal of an equitable research ecosystem expansion of targeted efforts to include further diverse and historically excluded scholars is necessary.

Sincerely,

Patricia L. Morris, MS, PhD
FASEB President