



February 10, 2022

National Institutes of Health, Office of the Director, Chief Officer for Scientific Workforce Diversity
Attention: Marie A. Bernard, MD, Chief Officer for Scientific Workforce Diversity

In response to [NOT-OD-22-054](#) “Inviting Comments and Suggestions on the Draft NIH Chief Officer for Scientific Workforce Diversity Strategic Plan for FYs 2022-2026”

Submitted electronically via email: COSWDStrategicPlan@nih.gov

Dear Dr. Bernard,

The Federation of American Societies for Experimental Biology (FASEB), representing 30 scientific societies and over 130,000 individual scientists, applauds National Institutes of Health’s (NIH’s) concerted efforts to promote diversity, equity, inclusion, and accessibility (DEIA) across the scientific workforce. Centralizing efforts in the Chief Officer for Scientific Workforce Diversity Office (COSWD) enables catalyzing change both intramurally at NIH and broadly to the extramural community. To achieve this, the five-year draft strategic plan is understandably wide-ranging; FASEB recommends emphasis on expanding targeted populations, and endeavors to communicate knowledge gained through routine engagement with the extramural community.

Include Perspectives of Marginalized Scholars

The draft strategic plan highlights the [Notice of NIH’s Interest in Diversity](#) definition of underrepresented groups, which includes individuals from racial and ethnic groups shown by National Science Foundation (NSF) to be underrepresented in health-related sciences, individuals with disabilities, individuals from disadvantaged backgrounds, and women at the graduate level and beyond. Centering efforts to be inclusive of these historically excluded groups is vital, yet other marginalized scholars remain excluded. FASEB urges COSWD to expand strategic plan goals and objectives by acknowledging and including the perspectives of marginalized groups, including targets of harassment, sexual orientation and gender identity minorities, and scholars with racial identities that are minorities when data are disaggregated beyond current NSF collection categories.

Targets of Harassment

The COSWD draft strategic plan starkly omits mention of NIH’s work to [end harassment and discrimination](#) of any kind. While the initiative originally focused on [sexual harassment](#), there has recently been an emphasis on racial discrimination as part of efforts to underscore that no type of harassment is tolerated by NIH. While anyone can be harassed, NIH’s own [workplace climate and harassment survey](#) revealed women, sexual or gender minorities, people with disabilities, individuals between 18 and 24 years old, and students and trainees were more likely to experience sexual harassment. Those affected by harassment, including some individuals with identities that are disproportionately more likely to be harassed, are not part of any classic definition of diversity; yet it is well recognized that

creating safe and inclusive environments is a path forward towards equity. FASEB urges COSWD to collaborate with staff and volunteers invested in NIH's efforts to end harassment to create safe conditions where all members of the scientific ecosystem can thrive.

Expand Diverse Populations Included in Targeted Efforts

Individuals belonging to groups identified in the [Notice of NIH's Interest in Diversity](#) represent many historically excluded from science, yet neglect several key populations. For instance, scientists belonging to sexual orientation and gender identity (SOGI) minorities are not explicitly reflected in COSWD's mission to enhance forms of diversity in the scientific workforce. The [United States Census collects SOGI data](#), and has identified meaningful differences in economic and mental health hardship during the COVID-19 pandemic compared to respondents that did not identify as lesbian, gay, bisexual, or transgender. Attention to SOGI populations, importantly during surveys, has been recommended by the [Human Rights Campaign Foundation](#); a sentiment FASEB echoed several times to NSF by asking the agency to update the [Survey of Graduate Students and Postdoctorates in Science and Engineering](#), [Survey of Earned Doctorates](#), and [Survey of Doctorate Recipients](#). As previously mentioned, NIH paid close attention to the intramural SOGI population during the workplace climate and harassment survey. FASEB is also aware of other NIH [programs and resources](#) centered on SOGI populations, including very visible activities such as the [Sexual and Gender Minority Research Working Group](#). FASEB recommends COSWD adopt this larger NIH ethos of elevating concerns of SOGI individuals and intentionally incorporate these scientists' experiences and perspectives when building, disseminating, and acting on evidence to effect positive change in the scientific workforce.

Based on NSF data, the current definition of underrepresented racial and ethnic groups is limited to Blacks or African Americans, Hispanics or Latinos, American Indians or Alaska Natives, and Native Hawaiians and other Pacific Islanders. These categories are broad and mask many individuals who likely have been, or currently are, the only person with their racial identity in their environment. One stark example is that Asian scientists are not considered a minority, but in the general United States population just [six origin groups](#) account for 85 percent of all Asian Americans as of 2019. Combining all Asians together means truly underrepresented individuals who are Pakistani, Thai, Hmong, Laotian, and many more, are effectively erased and may be unable to participate in funding opportunities limited to NIH's definition of diversity. Reiterating [prior FASEB comments](#), disaggregating sweeping categories will reveal additional gaps in representation within the NIH community. To achieve the ultimate goal of an equitable research ecosystem, additional attention must be paid to historically excluded groups not reflected in NIH's official definition of diverse populations.

Communicating Knowledge and Engaging Stakeholders in the Extramural Community

FASEB appreciates the cross-cutting theme of communication through COSWD's draft strategic plan and applauds the goal of strong NIH collaborations and partnerships with external stakeholders. As COSWD identifies outcomes from each DEIA program and evaluation during the iterative process, FASEB is eager to adapt and apply this knowledge to our DEIA efforts and recommends COSWD relay findings to external stakeholders as often as possible.

Engaging Audiences with the Scientific Workforce Diversity Seminar Series

COSWD's [Scientific Workforce Diversity Seminar Series](#) (SWDSS) has tackled prescient topics in the past, and importantly these sessions are free and open to all interested. These events have been well attended and are a keen example of engaging a broad audience. Based on the quality of materials

presented and speakers selected, it is obvious how much time and work COSWD puts into the SWDSS. FASEB is grateful for this valuable series and will continue to promote the SWDSS and future offerings to FASEB member societies.

Reaching the Entire Scientific Workforce Ecosystem

Improving DEIA across the scientific ecosystem will likely require reaching far beyond typical NIH stakeholders. A top-down approach relying on Vice Presidents for Research, Deans, Provosts, and similar may not achieve widespread knowledge and uptake of COSWD efforts. Instead, FASEB encourages deliberately seeking out audiences that traditionally do not have direct lines of communication with NIH. For example, climate assessments may be conducted by the Office of Equity, departmental Chairs, graduate student governments and postdoc offices/groups, or the Office of Student Affairs. Cultivating relationships with stakeholders beyond the usual players may help produce meaningful results in improving scientific environments.

Additionally, while much of NIH's extramural funding goes to academic universities, other grantees beyond academia with NIH funds, should also be intentionally included in outreach and communication efforts. Concerted effort to reach all of the community, beyond academia, is necessary. Furthermore, most current biomedical and biological PhD students will not stay in academia; rather, based on [NIH's own data](#), the majority will branch out into all facets of the scientific workforce. Therefore, it is vital that the next generation of scientists have access to and utilize the DEIA resources assembled and disseminated by COSWD to ensure promotion of DEIA across the research ecosystem.

Adequate Response Time for External Stakeholders

While FASEB appreciates the opportunity to comment on COSWD's draft strategic plan, the 30-day response timeframe limits stakeholder feedback. Many organizations, FASEB included, have a rigorous internal process to ensure comments genuinely reflect concerns of members. Quick turnarounds do not allow organizations to engage their full spectrum of volunteer leaders and collate robust input from those currently experiencing unwelcoming scientific environments. With transparency and communication being clear COSWD priorities, FASEB [repeats a previous ask](#) that future deadlines for thoughtful feedback, particularly on issues as central to the workforce as DEIA, be at least 60 days.

Sincerely,



Patricia L. Morris, MS, PhD
FASEB President