



# FASEB

Federation of American Societies  
for Experimental Biology

## Representing Over 130,000 Researchers

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March 4, 2021

Suzanne H. Plimpton  
Reports Clearance Officer  
National Science Foundation  
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Alexandria, VA 22314

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 February 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 doctoral scientists. This national effort to track work activities, job relatedness to doctoral degree, salary, and broader career outcomes of doctoral scientists is crucial to understanding PhD employment outcomes. Information collected and subsequent analyses of SDR data creates opportunities for policies to be data-driven and adapt to address the needs of researchers in an evolving scientific workforce ecosystem. Evidence resulting from the SDR is essential to supporting NSF's commitment to broadening participation.

Echoing prior FASEB comments in response to renewals of the [Survey of Graduate Students and Postdoctorates in Science and Engineering](#) and the [Survey of Earned Doctorates](#), FASEB is eager to see demographics 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 by granular identities will be powerful. All stakeholders in the scientific enterprise will benefit from enhanced understanding of the backgrounds and experiences of the current workforce. This is especially vital for historically excluded groups as these individuals represent a core component of broadening participation to create and promote diversity in the highly trained scientific talent pool.

FASEB was pleased to learn of NSF's involvement in the Federal Interagency Working Group on Measuring [Sexual Orientation and Gender Identity](#) (SOGI) in response to prior comments. Once consistent measures for application across federal agencies have been established, the Federation looks forward to swift implementation. Collection of data on marginalized scholars is critical for advancing policies and practices to create inclusive, equitable environments. NSF can be a leader and standard-bearer in establishing norms for data collection with identity and intersectionality at the forefront. FASEB looks forward to completion of research examining the inclusion of SOGI-related questionnaire items in surveys and urges prompt updates to NSF-issued surveys.

Sincerely,

Louis B. Justement, PhD  
FASEB President

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