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RE: Comments on Diversity Framework

The American Society for Biochemistry and Molecular Biology (ASBMB) is an international nonprofit scientific and educational organization that represents more than 12,000 students, researchers, educators and industry professionals. The ASBMB strongly advocates for strengthening the science, technology, engineering and mathematics (STEM) workforce, supporting sustainable funding for the American research enterprise, and ensuring diversity, equity and inclusion in STEM.

On Feb. 1, the National Institute of Health [requested feedback](#) on its “Framework for the NIH-Wide Strategic Plan for Diversity, Equity, Inclusion and Accessibility.” The framework has three objectives: (1) implement organizational practices to center and prioritize DEIA in the workforce, (2) grow and sustain DEIA through structural and cultural change, and (3) advance DEIA through research.

This framework is too generic and fails to state specific target outcomes for each objective. In addition, there is no clear action plan for NIH to follow to incorporate DEAI into its programs. The ASBMB would like to see the following in the next iteration of the framework:

- Clearly defined goals, target outcomes, and accountability measures for each objective.
- An action plan for incorporating DEAI into intramural and extramural programs.

In addition, the ASBMB has suggestions relating to each objective and an additional recommendation. They are described below.

Objective 1: Implement Organizational Practices to Center and Prioritize DEIA in the Workforce

ASBMB recommendation: Use culture and climate surveys

The ASBMB recommends that NIH evaluate both its organizational *culture* and *climate*. This requires designing, deploying and analyzing surveys that provide information and feedback on *how things are done* and *how people feel*.

Learning how historically underserved investigators and trainees, in particular, characterize the organizational culture and feel about it is an important first step toward designing and using evidence-based tools, including but not limited to training, to end structural racism, ableism, sexism and other forms of discrimination in NIH programs.

Given that the agency has [eight diversity offices](#), we recommend that the NIH house all data produced by culture and climate surveys and by all of its other DEAI initiatives in a public, centralized database. Publishing all information in one location (such as [COSWD](#)) will make it easier for the STEM community and the public to keep track of and evaluate the outcomes of the agency’s DEAI-related activities. The NIH must be transparent if it is to be perceived as a leader in DEIA in STEM.

Once the NIH has used itself as a testbed for culture and climate surveys, it can then roll out similar assessments to institutions receiving NIH funding.

Objective 2: Grow and Sustain DEIA through Structural and Cultural Change

*ASBMB recommendation: Create working group
focused on minority-serving institutions*

The ASBMB recommends tasking a new or existing working group with engaging minority-serving institutions (MSIs) — with the ultimate goal of ensuring that they have the funds, infrastructure and tools necessary to recruit and retain people from groups that have been marginalized in STEM. MSIs are leaders in training and producing diverse investigators, and they are an [underutilized asset for strengthening the STEM enterprise](#).

The NIH has established advisory committees to the director and other working groups in the past to solicit external feedback and make recommendations so that the agency can develop policies and plans to address a multitude of issues, such as sexual harassment in STEM, diversity in STEM, and workforce development.

The working group focused on MSIs should solicit feedback from these valuable institutions and subsequently develop recommendations for what the NIH should do differently to fully prepare, retain and empower the next generation of diverse scientists.

Objective 3: Advance DEIA through Research

*ASBMB recommendation: Expand collection of data
about investigators and institutions and available data tools*

The ASBMB recommends that the NIH expand its data collection to take into consideration intersectional identities and institutional classifications and produce useful data tools.

While the [NIH Data Book](#) publishes demographic data, it isn't always consistent in how it describes certain categories and should, in fact, contain additional categories. For example, it should not conflate sex and gender. The ASBMB recommends including gender identity and sexual orientation and using standardized language when collecting these data so that the agency will be better positioned to respond to [issues facing LGBTQIA+ individuals](#).

The society also recommends collecting and publishing more institutional data, such as classification (using the [Carnegie Classification of Institutions of Higher Education](#)), so that the STEM community and public will be able to easily find out how much NIH funding each institution classification receives. Currently, the only source of investigator and institution information is [NIH RePORTER](#). While the STEM community and the public can use RePORTER to search by investigator or institution, the tool does not allow you to see how much NIH funding goes to, for example, institutions classified by Carnegie as having very high research activity or those classified as being tribal colleges.

Finally, NIH should collaborate with other federal funding agencies, such as the National Science Foundation (NSF), to make data-exportation more accessible. The NSF's National Center for Science and Engineering Statistics, for example, has [tools](#) that could be implemented at the NIH. NSF's [chart-](#)

and [table-building](#) tools allow investigators and policy experts to export data for use in studies and reports.

Additional recommendation

*The NIH must ensure victims of harassment
have opportunities to continue their scientific careers*

The ASBMB recommends that the NIH modify its grant applications, fellowship applications and any other relevant programs to allow individuals to explain any discrepancies in their careers due to harassment. The NIH has made significant strides in addressing and mitigating harassment in STEM throughout its extramural research programs and by ensuring that the NIH has clear reporting paths. The ASBMB applauds the NIH for being a leader in this area. To continue this effort, the NIH should ensure that scientists whose careers have been affected by harassment have opportunities to continue their scientific research.