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Office of Planning, Evaluation and Policy Development
U. S. Department of Education
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RE: Comments on Department of Education's Equity Action Plan

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.

The ASBMB supports the Department of Education's equity action plan illustrating the agency's commitment to diversity, equity, accessibility and inclusion. We recognize that the department has taken measures toward equity already by distributing over \$13 billion to minority-serving institutions (MSIs) and \$3 billion to support children with disabilities through the American Rescue Plan. However, we recommend the department do more to increase funding to underserved institutions of higher education and protect students in the LGBTQ community at all levels of education.

The ASBMB recommends that the department include the following policies in its equity action plan: (1) collaborate with federal funding agencies, such as the National Institutes of Health (NIH) and the National Science Foundation (NSF), on MSI outreach to build research capacity at MSIs, and (2) diversify peer reviewers.

1. Collaborate with other agencies on MSI outreach

The ASBMB recommends that the department collaborate with other federal agencies, such as NIH and NSF, which will allow for open communication between agencies on successful strategies to grow research capacity at MSIs. We urge the department to increase funding opportunities to build research infrastructure at these institutions, especially Hispanic-serving institutions (HSIs), tribal colleges and universities (TCUs), and Asian American, Native American, Pacific Islander-serving institutions (AANAPISIs), which receive the lowest amount of funding per student compared with other MSIs. To ensure that more students from historically marginalized groups earn advanced degrees in STEM, we urge the department to strengthen STEM graduate programs at HSIs, TCUs, and AANAPISIs by creating a program similar to the department's [Strengthening Historically Black Graduate Institutions Program](#) at other qualifying MSIs. Establishing programs as this will increase funding for incorporating programs such as this into the department's equity action plan will advance the agency's goal to ensure equal access to education

2. Diversify grant reviewers and support faculty at underserved institutions

The ASBMB recommends that the department research the diversity of its peer reviewers and conduct outreach to underserved institutions to facilitate grant-writing workshops. Currently there is no public

data on the diversity of peer reviewers. As the department collects data from grantees to fulfill the [Executive Order](#) to “assess whether underserved communities and their members face systemic barriers in accessing benefits and opportunities available pursuant to those policies and programs”, we recommend the department also conduct research on the type of institutions and demographics of peer reviewers to determine which group. Moreover, to increase transparency, we ask that the department publish a report on its findings to the equity dashboard.

Furthermore, in the equity action plan, the department states that it has difficulty recruiting diverse peer reviewers. We suggest the department reach out to professional societies for contacts and to stakeholders at MSIs and institutions that serve historically marginalized groups, such as [Gallaudet University](#), to serve as peer reviewers.