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RE: Draft NIH Chief Officer for Scientific Workforce Diversity Strategic Plan for FYs 2022-2026

The American Society for Biochemistry and Molecular Biology 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 applauds the efforts led by the National Institutes of Health’s chief officer for scientific workforce diversity. Evidence-based approaches to address inequity and disparity are necessary to ensure that the biomedical research enterprise is an equitable and inclusive environment. The ASBMB has five recommendations to expand the efforts laid out in the strategic plan draft for fiscal years 2022–2026.

**Recommendation 1: Expand efforts to prevent and mitigate gender harassment in NIH’s intramural research program**

The NIH conducted the NIH Workplace Climate and Harassment Survey to better understand employee experiences with workplace harassment and inappropriate conduct. The report was released in 2020 with concerning findings: One in five survey respondents experienced sexual harassment in the previous 12 months; women, gender minorities and individuals with a disability were more likely to experience harassment; and many respondents indicated that their supervisors did not respond appropriately in cases of harassment.

The ASBMB urges the NIH to take the appropriate steps to address gender harassment within NIH’s intramural research program and to ensure that a system of accountability is put in place. We strongly encourage the NIH to solicit the review of an external third party to collect further evidence of the current harassment and conduct allegations and to provide recommendations to address these significant and worrisome findings.

**Recommendation 2: Pursue external collaborations with minority-serving institutions to further engage scientists from historically marginalized groups in NIH’s extramural research program**

Minority-serving institutions — including but not limited to historically black colleges and universities, tribal universities, Hispanic-serving institutions and emerging research institutions — are rapidly expanding science programs and are a valuable resource to improve and increase diversity and equity efforts.
The NIH has made some progress in funding research at MSIs, including the Building Infrastructure Leading to Diversity program, the National Research Mentoring Network, and the Coordination and Evaluation Center. However, the NIH must further expand these opportunities. Expanding funding opportunities and amplifying the voices of researchers at MSIs are both vital to increasing diversity and equity in the STEM workforce.

**Recommendation 3: Track, report and publish grants awarded to minority-serving institutions**

While the NIH has several programs aimed at increasing diversity in STEM, there is still a disparity in graduate training diversity grants awarded to MSIs. The NIH should make a concerted effort to ensure that funding decisions are equitable between minority-serving institutions and other research institutions, such as more established R1 universities. The NIH must sufficiently support MSIs to increase diversity, equity and inclusion; research has thoroughly established the importance of MSIs in strengthening the U.S. STEM workforce and increasing retention of students from historically marginalized backgrounds.

Collecting these data and posting it publicly on NIGMS Loop will ensure accountability. The NIH must understand where funding for programs aimed at increasing diversity goes and if there are disparities between which institutions receive funding for these programs.

**Recommendation 4: Support scientists with disabilities**

The NIH must ensure that their grant application process accommodates for scientists with disabilities and the NIH must collect data on scientists with disabilities to better understand potential disparities in funding and other barriers to inclusion for scientists with disabilities.

According to the National Science Foundation, about one in nine scientists has a disability. In addition, people with disabilities are less likely to complete college, pursue STEM degrees and less likely to earn a postsecondary degree. However, there are established strategies the NIH can use to improve recruitment and engagement of scientists with disabilities, such as promoting research experiences to students with disabilities, recruiting people with disabilities onto advisory boards and promoting and sharing inclusion practices for research institutions. The NIH must identify clear strategies that will increase accessibilities for scientists with disabilities.

The NIH has taken an important step of establishing an Advisory Working Group to the Director subgroup on Individuals with Disabilities to identify strategies that support differently abled individuals. But this working group has not provided the NIH with concrete recommendations on how to make the American research enterprise more inclusive and equitable since it was created. The ASBMB strongly encourages the NIH to work closely with this subgroup to advance inclusivity.

**Recommendation 5: Support LGBTQAI+ scientists**

The NIH should include collecting data to better understand the barriers to inclusion for lesbian, gay, bisexual, transgender or queer (LGBTQAI+) scientists in the scientific workforce diversity plan by adding sexual orientation to the demographics of the NIH Scientific Workforce Recruitment Tool. LGBTQAI+ scientists are more likely to experience harassment and career obstacles than their non-LGBTQAI+ colleagues.
As it currently stands, there is only one large scale study about the experiences of LGBTQAI+ scientists, indicating that the research community needs to conduct more research to better understand the barriers LGBTQAI+ scientists face. The NIH, as the research agency leader, should initiate these research projects to better understand how they can support this community. As mentioned above, the NIH must ensure that a system of accountability is in place to protect researchers from harassment.