

April 8, 2021

Office of the Director
National Institutes of Health
9000 Rockville Pike
Bethesda, Maryland 20892

Re: RFI No. NOT-OD-21-066

Dear Dr. Francis Collins,

On behalf of the Council of Graduate Schools (CGS), I write in response to the National Institutes of Health's (NIH) Request for Information (RFI): Inviting Comments and Suggestions to Advance and Strengthen Racial Equity, Diversity, and Inclusion in the Biomedical Research Workforce and Advance Health Disparities and Health Equity Research (NOT-OD-21-066)¹. The Council of Graduate Schools represents approximately 500 colleges and universities across the United States, Canada, and abroad. Collectively, our members grant 87% of all U.S. doctorates and the majority of U.S. master's degrees.

Addressing structural racism in the scientific community is vital to the success of the U.S.'s research enterprise. Making the scientific and research community, particularly at NIH, more accessible to historically underrepresented populations will rear unique perspectives and strategy, resulting in increased innovation. A recent CGS study found that minority graduate students remain substantially underrepresented in graduate education, particularly in science, technology, engineering, and mathematics (STEM) fields², indicating a need for increased diversity across the enterprise. CGS applauds NIH's efforts to establish an equitable and civil culture within the biomedical research enterprise and reduce barriers to racial equity in the biomedical research workforce.

The COVID-19 pandemic's disproportionate impact on persons of color, particularly women of color, underscored policies and practices in dire need of change to create a more inclusive and welcoming community for diverse Americans. CGS offers the following recommendations for the UNITE initiative:

¹ Request for Information: Inviting Comments and Suggestions to Advance and Strengthen Racial Equity, Diversity, and Inclusion in the Biomedical Research Workforce and Advance Health Disparities and Health Equity Research:

<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-21-066.html>

² CGS Report: Graduate Enrollment and Degrees: 2009-2019

https://cgsnet.org/ckfinder/userfiles/files/CGS_GED19_Report_final2.pdf

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Conference
of Southern
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Association
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Northeastern
Association
of Graduate Schools

Western
Association
of Graduate Schools

Expand Postbac Training Focused on Disrupted Research

In response to the RFI's request for comments on the following sub-topic:

All Aspects of the Biomedical Workforce

- *Factors that present obstacles to training, mentoring, or career path* (e.g., training environments) leading to underrepresentation of racial and ethnic groups (particularly Black/African Americans) in the biomedical research enterprise throughout the educational and career continuum and proposed solutions (novel or proven effective) to address them

Current post baccalaureate research traineeships (postbacs) available through NIH offer undergraduates who plan to apply to graduate school (master's, Ph.D., M.D., or equivalent graduate degree) the opportunity to engage in a scientific research training environment, preparing them with unique skills necessary for success during graduate school. In 2020, the COVID-19 pandemic forced several institutions to delay or discontinue STEM research, negatively impacting both undergraduate and graduate researchers' paths to degree completion and graduation as well as depleting graduate students' career prospects.³ Given the disruptions to undergraduate research programs and opportunities for skill development, UNITE should meet the need for additional opportunities for undergraduate students to develop and enhance basic laboratory techniques and skills that would otherwise have been acquired and will be imperative for success in graduate school.

Expanding the NIH postbac training programs to support researchers whose studies have been interrupted due to the COVID-19 pandemic would revitalize the STEM workforce pipeline and serve as a recruiting opportunity for future scientists. CGS recommends UNITE expand training opportunities centered on the inclusion of minority researchers to further combat systemic racism in the science community; increase innovation productivity; and contribute to a more diverse workforce.

Partner with NIH Bridges Training Programs

In response to the RFI's request for comments on the following sub-topic:

All Aspects of the Biomedical Workforce

- *New or existing influence, partnerships, or collaborations* NIH could leverage to enhance its outreach and presence with regards to workforce diversity (both the internal NIH workforce and the NIH-funded biomedical research enterprise); including engagement with academic institutions that have shown a historical commitment to educating students from underrepresented groups (especially Historically Black Colleges and Universities (HBCUs), Hispanic-Serving Institutions (HSIs), Tribal Colleges and Universities

³ Graduate Schools Respond to COVID-19: Promising Pathways to Innovation and Sustainability in STEM Education: <https://www.norc.org/PDFs/Graduate%20Studies%20COVID/Graduate%20Schools%20Respond%20to%20COVID-19%20Executive%20Summary.pdf>

(TCUs), and other institutions), racial equity organizations, professional societies, or other federal agencies

To ensure the health of the scientific and research pipeline of doctoral students, CGS recommends the UNITE initiative partner with the existing NIH Bridges programs, namely the [Bridges to the Doctorate Program](#). This program supports the transition of master's students in the biomedical sciences to relevant Ph.D. programs by emphasizing effective, evidence-based approaches to biomedical training and mentoring and seeks to enhance diversity in the biomedical research workforce. The goals of this program to increase doctoral attainment are hyper-relevant given that graduate students enrolled in master's programs at a higher rate than doctoral programs in fall 2020.⁴ Considering HBCUs grant more bachelor's degrees in STEM fields to Black students than traditionally white institutions, HBCUs play an integral role in diversifying the STEM workforce. By investing in institutions, particularly Historically Black Colleges and Universities (HBCUs) and other Minority Serving Institutions (MSIs), NIH can preserve the continuation of a diverse student-to-workforce pipeline.

Expand Mental Health Research

In response to the RFI's request for comments on the following topic:

Research Areas

- *Significant research gaps or barriers to expanding and advancing the science of health disparities/health inequities research and proposed approaches to address them, particularly those beyond additional funding (although comments could include discussion of distribution or focus of resources),*

CGS recommends UNITE bolster the National Institute of Mental Health (NIMH), the lead federal agency for research on mental disorders, to conduct expansive research on mental health. The COVID-19 pandemic underscores how structural racism and anti-blackness depletes economic, health, and mental health stability in graduate students. As of December 2020, nearly one third of graduate students reported symptoms consistent with post-traumatic stress disorder or clinically significant levels of anxiety and depression.⁵ The pandemic has exacerbated mental health concerns shared among the graduate community, and additional research is necessary to revise student support services and pedagogies. This research has the ability to reshape the scientific and research enterprise to not only become increasingly inclusive but also to support minority populations in managing historical trauma, including the disproportionate affect of the COVID-19 pandemic.

In the U.S., communities of color are more likely to have experienced loss due to the coronavirus. The Centers for Disease Control and Prevention names discrimination, including racism, against members of racial and ethnic minority groups among the factors that contributes

⁴National Student Clearinghouse Research Center's Regular Updates on Higher Education Enrollment Fall 2020 (As of September 24) <https://nscresearchcenter.org/stay-informed/>

⁵ NSF RAPID: Graduate Student Experiences of Support and Stress During the COVID-19 Pandemic https://www.montana.edu/covid19_rapid/updated%20NSF_RAPID_GraduateStudentExperiences_Covid19_White_Paper.pdf

to increased risk of contracting the coronavirus.⁶ Mental health research centered on supporting minority populations in managing, and eventually overcoming, the disproportionate impact of the pandemic is essential to effectively implementing diverse, equitable, and inclusive practices in the science community and beyond.

Support for Researchers, Recognizing COVID-19's Disproportionate Affects on Minority Populations

In response to the RFI's request for comments on the following topic:

Further Ideas

- *Additional ideas* for bold, innovative initiatives, processes or data-driven approaches that could advance the diversity, inclusion, and equity of the biomedical research workforce and/or promote research on health disparities

As the U.S. has adjusted policies, practices, and procedures to meet the new reality of remote academic work during the COVID-19 crisis, the speed of the efforts has unfortunately failed to properly incorporate diversity, equity, and inclusion (DEI) practices. The pandemic crisis will have a greater negative impact on the career trajectories of persons of color, especially women of color, in STEM. NIH must include a response to the racial disparity that threatens progress toward racial and ethnic equity and DEI success. CGS suggests NIH reference the following programs at other federal agencies to implement policies and grant opportunities that support equitable opportunities and proactively combat systemic inequalities that further racial and gender gaps in the science and research enterprise.

The National Science Foundation (NSF) [ADVANCE: Organizational Change for Gender Equity in STEM Academic Professions](#) (ADVANCE) program's goal is to expand the use of evidence-based systemic change strategies that promote equity in academia. Through grants centered on supporting equity and inclusion to mitigate the systemic factors that create inequalities, the NSF ADVANCE program supports proposals that incorporate intersectionality, the understanding that an individual's identities do not exist in isolation from one another. CGS recommends that the UNITE initiative include grant opportunities that seek novel approaches to combatting systemic racism in the science and research enterprise. Grants should be awarded to proposals that support equitable and inclusive strategies for graduate students through mid-career and tenured researchers.

Additionally, [NSF's Career-Life Balance Initiative](#) formalizes foundation-wide policies that safeguard equitable opportunities for NSF awardees, from graduate students to full-time professors, who need to take a leave of absence due to dependent-care responsibilities, including the birth or adoption of a child. The trends of women, particularly women of color, taking on more caregiving responsibilities than their male counterparts have only become more salient during the COVID-19 pandemic. According to a recent study, those with caregiving responsibilities before the pandemic increased their time on caregiving responsibilities by 7.6 hours per week during the pandemic and almost one-third of women respondents knew another

⁶ Health Equity Considerations and Racial and Ethnic Minority Groups: <https://www.cdc.gov/coronavirus/2019-ncov/community/health-equity/race-ethnicity.html>

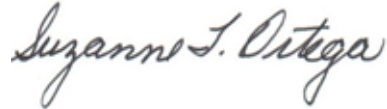
woman who had recently left the workforce because of caregiving responsibilities.⁷

There is a clear need for supportive policies and funding that will assist all researchers in making up for lost research, regaining skills, and clearing obstacles that would prevent equitable re-entry following a career break. A specific investment should be granted to graduate students and researchers, especially those of color, who have had a family or health-related disruption in their research due to the pandemic. Reinforcing graduate students' ability to make up for lost research and complete their degrees in a timely manner negates interruption to America's economic prosperity and national security.

Given the COVID-19 pandemic's disproportionate impact on women, CGS recommends that the UNITE initiative use the named NSF programs as models to shape additional training programs and funding opportunities to support persons, and specifically women, of color in reaffirming their STEM knowledge base, skillset, leadership, and management capacities.

Again, CGS commends NIH for these efforts and offers its support and recommendations to advance NIH's charge to address and combat structural racism in the scientific community. Our association stands ready to work with NIH and the administration to help develop policies that will help make the scientific community more inclusive, diverse, and equitable. If you have any questions, please contact CGS' Manager of Public Policy and Government Affairs, Matthew Smith, at msmith@cgs.nche.edu.

Sincerely,



Suzanne T. Ortega
President

⁷ The Disproportionate Impact of the Pandemic on Women and Caregivers in Academia: https://sr.ithaka.org/publications/the-disproportionate-impact-of-the-pandemic-on-women-and-caregivers-in-academia/?utm_source=Sailthru&utm_medium=email&utm_campaign=Newsletter%20Weekly%20Roundup:%20Higher%20Ed%20Dive:%20Daily%20Dive%2004-03-2021&utm_term=Higher%20Ed%20Dive%20Weekender

