

March 30, 2022

Comments submitted electronically on the NIH RFI submission website.

Re: NIH NOT-OD-22-061, Inviting Comments and Suggestions on a Framework for the NIH-Wide Strategic Plan for Diversity, Equity, Inclusion and Accessibility

The Society for Women's Health Research (SWHR) is pleased to offer comments in response to the National Institutes of Health (NIH) Request for Information (RFI): Inviting Comments and Suggestions on a Framework for the NIH-Wide Strategic Plan for Diversity, Equity, Inclusion, and Accessibility (DEIA).

SWHR is a more than 30-year-old national nonprofit dedicated to improving women's health through science, policy, and education. As an organization whose work and mission revolves around women's health research and scientific integrity, SWHR recognizes the critical role of diversity in enhancing science by broadening the scope of scientific inquiry and enhancing the perspectives being represented in research. We applaud NIH for demonstrating its commitment to embrace, integrate, and strengthen DEIA across all NIH activities through this Strategic Plan.

While we recognize that this is simply a framework and that core elements of this Strategic Plan for DEIA will be expounded upon in the full draft, SWHR would like to raise a few key points for the agency's consideration as it develops the comprehensive plan.

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

SWHR supports **NIH Workforce** and **Workforce at Institutions Supported by NIH Funding** as the designated focus areas under Objective 1. Concentrating on each of these populations as NIH both analyzes and reinvigorates its organizational practices will be key in ensuring that NIH's policies lead to centering and prioritizing DEIA in its workforce.

Reaching this objective, however, will require NIH's attention on subpopulations within the NIH workforce as well as institutions' workforces. This includes exploring the critical intersection of race, ethnicity, and gender, and considering how these issues can change the nature of the barriers individuals face or create new barriers. On this point, SWHR would flag the following issues as key needs for the DEIA Strategic Plan:

- **Women in the Research Workforce.** Although women account for about half of medical graduates and doctoral recipients in the biological sciences, they are underrepresented

at all levels of leadership in the biomedical field.¹ Women in research earn less,² receive less funding at the beginning of their careers,³ and are cited less frequently.⁴ Women are also more likely to switch to part-time work, change careers, or leave the workforce. Furthermore, women disproportionately face sexual harassment and discrimination.^{5,6}

Disparities are even greater for women of color, who encounter both significant racial and gender biases. These biases can present differently, but have a detrimental impact on those forced to confront them. For example, Black women are significantly more likely to report having to provide more evidence of competence to prove themselves to colleagues, and Latinas are more frequently perceived as “angry” or “emotional.” Black women are also more likely to report feeling isolated in their work environment.⁷

- **Scientists of Color.** Recent scientific communications suggest that racial disparities in NIH R01 funding can significantly and negatively affect the careers of faculty members and scientists of color. While white men and women are about as likely to receive an R01 award, Asian women and Black women are significantly less likely to receive the same funding.⁸ Among certain fields, the disparities become even more striking. For example, in 2019, female surgeons received NIH grants at significantly lower rates than male colleagues, and no Black or Hispanic women surgeons received R01s or equivalent awards.⁹ SWHR encourages NIH to specifically address the barriers facing scientists of color within the NIH, including investigating and defining these barriers and creating and implementing policies that will address these disparities.

Comments on Objective 2: Grow and Sustain DEIA Through Structural and Cultural Change

SWHR believes the sections identified under Objective 2—**Stewardship, Partnerships and Engagements, Accountability and Confidence, and Management and Operations**—cover the right range of areas to achieve cultural change. Yet, how NIH builds on each of these areas will be critical for determining success.

¹ Clayton et al. Women’s Careers in Biomedical Sciences: Implications for the Economy, Scientific Discovery, and Women’s Health. *Journal of Women’s Health*, 2017. doi: 10.1089/jwh.2016.6012

² Scientists’ salary data highlight US\$18,000 gender pay gap. *Nature*. January 22, 2019.

³ Sege, Nykiel-Bub, Selk. Sex Differences in Institutional Support for Junior Biomedical Researchers. *JAMA*. 2015; 314(11): 1175-1177. doi: 10.1001/jama.2015.8517

⁴ Why women are cited less often in research than men. *The Hill*. December 17, 2019.

⁵ Sexual harassment of women: Climate, culture, and consequences. *National Academies* (2018).

⁶ Funk and Parker. Women and Men in STEM Often at Odds Over Workplace Equity. *Pew Research Center*. January 2018. <https://www.pewresearch.org/social-trends/2018/01/09/women-and-men-in-stem-often-at-odds-over-workplace-equity/>

⁷ Williams, Phillips, & Hall (2014). Tools for change: Boosting the retention of women in the STEM pipeline. UC Hastings College of the Law. https://worklifelaw.org/publications/Double-Jeopardy-Report_v6_full_web-sm.pdf

⁸ Ginther, Kahn, & Schaffer (2016). Gender, race/ethnicity, and NIH R01 research awards: Is there evidence of a double bind for women of color? *Academic Medicine*, 91(8). Doi: 10.1097/aCm.0000000000001278

⁹ Lewit, Black, & Camp. (2020). Association of sex and race/ethnicity with National Institutes of Health funding of surgeon-scientists. *JAMA Surg*. 2021; 156(21), 19507. Doi: 10.1001/jamasurg.2020.5016

To build trust among stakeholders and ensure appropriate groundwork is undertaken, SWHR encourages NIH to continue reflecting on how its past policies and culture may have affected workforce growth and retention and how policies can be strengthened to ensure greater diversity and equity within review panels, in funding NIH awards, and in ensuring a representative biomedical research workforce.

In addition, SWHR encourages NIH to more strategically consider the roles of sex and gender and sexual and gender minorities. This includes not only analyzing how the current landscape may affect different populations—including how implicit or subconscious bias and harassment against LGBTQ and other populations may serve as a barrier to advancement—but also ensuring that future policies at NIH resolve the unique disparities faced by these populations in order to create a truly inclusive and welcoming workforce.

Finally, there are important considerations for enhancing recruitment and developing and rewarding practices specifically among women, who face unique challenges within the research workforce. A 2019 paper by Alfred, Ray, and Johnson highlights broad barriers that affect women and women of color in STEM:¹⁰

- *The effect of stereotyping, societal influences, and institutional influences throughout pre-college, college, and postgraduate studies.*
- *Isolation within the workforce and lack of inherent support systems.* Negative experiences, including feelings of tokenism, alienation, and a lack of support, can derail long-term aspirations and cause some women to leave the field. Women who stay in the workforce are vulnerable to harassment and discrimination, and peer networks are often found to be unwelcoming.
- *Disproportionate burdens from balancing career/caregiving responsibilities.* At work, women are expected to take on more service hours, provide more student mentorship, and engage in more administrative duties, while facing caregiving responsibilities at home. Emotional support, mentorship, and administrative responsibilities are not often reflected on a CV or incorporated in reviews.

It will be vital for NIH to carefully consider systemic barriers that affect women at each step of their careers, implement methods aimed at overcoming these obstacles, and create and foster safe training and work environments, which involves continuing its work to prevent and address harassment based on sex, gender, or race/ethnicity and ensure that reporting mechanisms, independent investigations of complaints, and consequences for harassment are continually communicated and emphasized.

¹⁰ Alfred, Ray, & Johnson (2019). Advancing women of color in STEM: An imperative for US global competitiveness. *Advances in Developing Human Resources*, 21(1), 114-32. Doi: 10.1177/1523422318814551

Mentorship and training for women and people of color are critical; however, balance should remain a consideration. Programs should be careful not to exacerbate feelings of isolation by highlighting individual or group status as a minority (with the implication being that these groups may be in need of more intensive support solely because of their minority status). Successful interventions will not only provide additional support to members of marginalized communities, but will incorporate initiatives that target pervasive biases on a systems level.

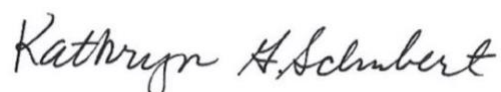
Comments on Objective 3: Advance DEIA Through Research

As a research-centered organization, SWHR appreciates that NIH has chosen to consider through this Strategic Plan how DEIA can be advanced through research by focusing on both **Workforce Research** and **Health Research**. While SWHR encourages NIH to continue building on the wealth of pre-existing evidence related to biomedical research workforce diversity—including how the pandemic disproportionately affected women in science and the prevalence of sexual harassment of women in STEM fields—and synthesize it to create a foundation on which to move forward, continuing to identify where there are knowledge gaps and the barriers individuals may face based on their identity will be key not only for measuring progress but also for providing insight into which strategies and tactics may need to be adjusted so NIH can achieve an inclusive, welcoming, and accessible workforce.

SWHR is pleased to see continued focus on removing systemic barriers that could inhibit DEIA within the biomedical research workforce and is optimistic that the NIH Strategic Plan for DEIA—in conjunction with the [2022 COSWD Strategic Plan for Fiscal Years 2022-2026](#)—can help initiate policies and programs that will foster and promote women and people of color in the scientific research workforce. Such programs and policies are imperative for the field's advancement.

Thank you for the opportunity to provide feedback to the NIH on this important effort. We look forward to continued opportunities to engage with the agency on this issue. If you have questions, please contact me at kathryn@swhr.org or SWHR's Chief Advocacy Officer Lindsey Horan at lindsey@swhr.org.

Sincerely,



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