

The AMERICAN ASSOCIATION of
IMMUNOLOGISTS



President

Jenny P. Ting, Ph.D.

Vice President

Gary A. Koretzky, M.D., Ph.D.

Past President

Jeremy M. Boss, Ph.D.

Secretary-Treasurer

Edith M. Lord, Ph.D.

Councillors

Mark M. Davis, Ph.D.

Akiko Iwasaki, Ph.D.

Stephen Jameson, Ph.D.

Ulrich H. von Andrian, M.D.

Executive Director

M. Michele Hogan, Ph.D.

October 6, 2020

Michael S. Lauer, M.D.

Deputy Director for Extramural Research

National Institutes of Health

One Center Drive, Building 1, Room 144

Bethesda, MD 20892

Ms. Michelle Bulls

Director, Office of Policy for Extramural Research Administration

National Institutes of Health

6705 Rockledge Dr., Building 1, Room 803-C

Bethesda, MD 20817

Dear Dr. Lauer and Ms. Bulls:

We are writing on behalf of The American Association of Immunologists (AAI), the nation's largest professional association of research scientists and physicians who study the immune system. AAI leaders have appreciated the opportunity to meet with Dr. Lauer over the years, most recently at his office in December 2018, to discuss a variety of issues of concern to our community.

Today we are writing to express AAI support for an effort by a group of scientists, including numerous AAI members and leaders, to "elevate to scorable status the *Recruitment and Retention Plan to Enhance Diversity* for all new and renewal institutional training grant applications (T32, T35, among others)" and to "extend the *Recruitment and Retention Plan to Enhance Diversity* to include diversity among training grant program faculty trainers (mentors) as a review criterion" across all NIH Institutes and Centers. Their letter, sent to you on July 24 (and attached here for your convenience), describes the importance of a diverse biomedical research workforce to "generating innovative ideas to solve the complex biomedical problems facing our society and combat systemic inequalities in the workforce."

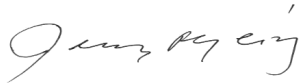
AAI is aware – and supportive – of NIH efforts to address longstanding inequities facing underrepresented minorities in the health-related sciences (identified in the attached letter as "individuals from several racial and ethnic groups, those with disabilities, and those from disadvantaged backgrounds"). And while we recognize that some of these efforts require complex solutions implemented over a period of time, we believe that this important proposal – making scorable the diversity plan required in NIH training grants – can be implemented quickly and easily.

AAI Letter to Dr. Lauer and Ms. Bulls
October 6, 2020
Page 2 of 2

Although scoring the proposed plan is clearly not as impactful as scoring the results of its implementation, we urge NIH to adopt this policy as a first step, and in so doing, to provide clear guidance regarding the new scorable category (i.e., specifying what kind of document might garner a good v. bad score).

We ask that you reply to the signatories of the attached letter, and to us, regarding NIH's decision in this matter. Should you have any questions, please feel free to contact either of us or Lauren Gross, AAI Director of Public Policy and Government Affairs, at lgross@aai.org.

Sincerely,



Jenny P. Ting, Ph.D.
President



Ross M. Kedl, Ph.D.
Chair, AAI Committee on Public Affairs

Attachment

July 24, 2020

Michael Lauer, MD
Director Office of Extramural Research, NIH Deputy Director for Extramural Research
Michelle Bulls
Director, Office of Policy for Extramural Research Administration

Dear Dr. Lauer and Ms. Bulls:

This letter is to strongly urge you to elevate the *Recruitment and Retention Plan to Enhance Diversity* to scorable status for Institutional Training Grants.

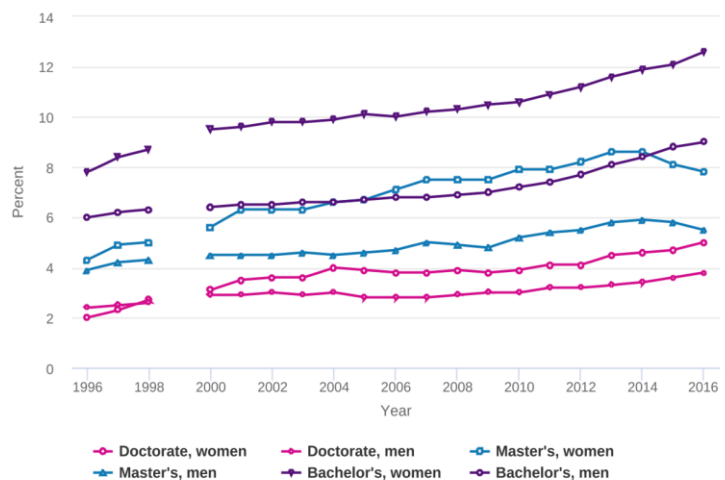
Diversity in the biomedical research workforce is important for generating innovative ideas to solve the complex biomedical problems facing our society and combat systemic inequalities in the workforce.

Unfortunately, individuals from several racial and ethnic groups, those with disabilities, and those from disadvantaged backgrounds are underrepresented in health-related sciences (NCSES, 2019).

NIH recognizes this, has explicitly expressed an interest in diversity (NIH NOT-OD-20-031, 2019), and has instituted numerous measures to address the issue. Despite various measures, gains in diversification of the biomedical research workforce have been limited (Figure 1) (NCSES, 2019).

Figure 1 (from reference 1).

Science and engineering degrees earned by underrepresented minority women and men, as a percentage of all S&E degrees awarded of each degree, by degree type: 1996–2016



One of the mechanisms used by NIH to address the problem of limited diversity has been the requirement that institutional training grant applications include a *Recruitment and Retention Plan to Enhance Diversity*. While the *Recruitment and Retention Plan to Enhance Diversity* is an important tool, its impact is limited by the fact that it is given little to no weight in the grant review process. This is because the *Recruitment and Retention Plan to Enhance Diversity* is not a scorable item on the reviewer's critique template. Furthermore, for new applications, reviewers are explicitly instructed that the *Recruitment Plan to Enhance Diversity* should not be considered in providing the overall impact/priority score.¹ The situation is slightly better for renewal applications, as the *Recruitment and Retention Plan to Enhance Diversity* is among a list of items reviewers are instructed to consider in the determination of scientific and technical merit,² but it is not

¹ "Additional Review Considerations As applicable for the project proposed, reviewers will address each of the following items, but will not give scores for these items and should not consider them in providing an overall impact/priority score." (NIH PA-18-403)

² "For Renewals, the committee will consider the progress made in the last funding period, including the Recruitment Plan at Enhance Diversity, and Training on the Responsible Conduct of Research. Does the application describe the program's accomplishment over the past funding period(s)? Is the program achieving its training objectives? Has the program evaluated the quality and effectiveness of the training experience, and is there evidence that the evaluation outcomes and feedback from trainees have been acted upon? Are changes proposed that are likely to improve or strengthen the research training experience during the next project period? Does the program continue to evolve and reflect changes in the research area in which the training occurs?" (NIH PA-18-403)

considered separately from other program accomplishments and still does not receive a score. As a result, many program directors do not give sufficient focus and attention to their plans to enhance diversity through their training grant, and none are held accountable for related outcomes.

The *Recruitment and Retention Plan to Enhance Diversity* is underpowered to impact the diversity of the biomedical research workforce because it is not a scorable item and is not considered in the priority scoring of institutional training grants.

While many institutions have embraced the need for diversity and have implemented measures to increase it, these institutions are not held accountable for the results of their efforts in the awarding of institutional training grants. Making the *Recruitment and Retention Plan to Enhance Diversity* one of the scorable items would increase the accountability for results. Thus, this request is that the following actions be taken at this time:

1. Elevate to scorable status the *Recruitment and Retention Plan to Enhance Diversity* for all new and renewal institutional training grant applications (T32, T35, among others) across all NIH Institutes and Centers.
2. Extend the *Recruitment and Retention Plan to Enhance Diversity* to include diversity among training grant program faculty trainers (mentors) as a review criterion across all NIH Institutes and Centers.

These actions can be accomplished by making diversity a critical element in each of the five existing review criteria: Training Program and Environment, Training Program Director(s), Preceptors/Mentors, Trainees, and Training Record.

Instituting these simple changes will further incentivize institutions seeking training grants to create training programs that recruit and retain diverse students. These changes will also allow review panel members to reward programs that have effectively moved the needle to increase diversity among their trainees and faculty trainers, and are thus meeting the critical societal need to increase diversity in the biomedical research workforce. Finally, NIH should continue to be a leader in correcting the paucity of diverse biomedical researchers, and now is the time to take every action available to do so.

Thus, we strongly urge you to implement the proposed change at this time.

Susan L. Ewart, DVM, PhD
Grant reviewer for the NIAID Allergy, Immunology, and Transplantation Research Committee
NHLBI R25 Training Program Director
Professor, Large Animal Clinical Sciences
Michigan State University
East Lansing, MI 48824
ewarts@msu.edu

Penelope A. Morel, MD
Reviewer and acting Chair of NIAID AITC study section
NIAID Autoimmunity and Immunopathology T32 co-Director
Professor of Immunology
University of Pittsburgh
Pittsburgh PA 15261
morel@pitt.edu

Tonya J. Webb, PhD
Reviewer for NIAID AITC study section
Associate Professor of Microbiology and Immunology University of
Maryland School of Medicine
685 W. Baltimore St; HSF I-380
Baltimore, MD 21201
twebb@som.umaryland.edu

An additional 44 scientists and physicians co-signed this letter.

References

1. Women, Minorities, and Persons with Disabilities in Science and Engineering: 2019. National Center for Science and Engineering Statistics. <https://www.nsf.gov/statistics/women/>
2. Notice of NIH's Interest in Diversity, Notice Number NOT-OD-20-031
<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-20-031.html>
3. Ruth L. Kirschstein National Research Service Award (NRSA) Institutional Research Training Grant (Parent T32) PA-18-403 Critique Template.

References

1. Women, Minorities, and Persons with Disabilities in Science and Engineering: 2019. National Center for Science and Engineering Statistics. <https://www.nsf.gov/statistics/women/>
2. Notice of NIH's Interest in Diversity, Notice Number NOT-OD-20-031 <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-20-031.html>
3. Ruth L. Kirschstein National Research Service Award (NRSA) Institutional Research Training Grant (Parent T32) PA-18-403 Critique Template.