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January 31, 2006

Mark Weiss
Office of Science and Technology Policy
MWeiss@ostp.eop.gov

Dear Mr. Weiss:

The National Postdoctoral Association (NPA) is pleased to submit comments on the "Proposed Principles for Federal Support of Graduate and Postdoctoral Education and Training in Science and Engineering" (FR Doc. 05-22744).

The mission of the NPA is to advance the US research enterprise by maximizing the effectiveness of the research community and enhancing the quality of the postdoctoral experience for all participants. As the national voice for postdoctoral scholars, the NPA commends the OSTP for recognizing that graduate students and postdoctoral scholars across the nation deserve consistent standards of support throughout their educational and training periods. Furthermore, the NPA strongly supports the recommendation that the principles set forth in this announcement should apply to ALL postdoctoral scholars funded both directly and indirectly (through research grants) by the federal government, especially since approximately 80% of federally-funded postdocs (50% of the nation's postdocs) are supported through the latter mechanism.

While the NPA enthusiastically supports the general principles proposed by OSTP for federal support of graduate and postdoctoral education and training, there are several key points that the NPA wishes to make with regard to postdoctoral scholars.

PRINCIPLE: Federal Support of Graduate and Postdoctoral Education and Training is a Critical Investment in the Future.

NPA Response: The NPA agrees that federal support for training is essential. Therefore, the NPA believes that this principle should include statements recommending that federal agencies maintain at current levels or increase funding for fellowships and traineeships, even under current budget constraints. In addition, commitment to postdoctoral training should not stop at the end of the training period. The best and brightest students will only be attracted to science and engineering disciplines if there are future employment opportunities available following their education and training periods. To ensure a well-prepared S&E workforce, funding agencies should encourage institutions to provide training for a variety of careers in addition to basic research.

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PRINCIPLE: The Federal Investment Portfolio Must Broadly Support Science and Engineering Disciplines.

NPA Response: The NPA encourages the federal government to maximize its investment in intellectual capital by aligning its graduate and postdoctoral education and training programs with current and projected S&E workforce needs. The NPA also encourages the OSTP to evaluate the current federal investment portfolio and, where possible, make official recommendations regarding S&E training priorities over the next several years.

PRINCIPLE: Graduate Students and Postdoctoral Scholars Must Receive Quality Education and Training.

NPA Response: Effective mentoring and career development, as well as fostering the transition of postdoctoral scholars to the next step in their careers are important and necessary standards to encourage; however, it is imperative that the terms “quality” and “effective” be defined for such standards. Without explicit definitions and examples of best practices, institutions and funding agencies will define these standards for themselves. The federal government is in a unique position to set standards that encourage consistent and effective training guidelines across funding agencies and institutions for its future S&E workforce. As an example of such standards, the NPA Recommended Practices Guide (attached) outlines a set of standards that the NPA urges all institutions to implement in the pursuit of consistent and defined practices for the training of postdoctoral scholars across the nation.

PRINCIPLE: Graduate Students and Postdoctoral Scholars Should be Adequately Supported to Encourage Their Pursuit of Science and Engineering Careers.

NPA Response: Postdoctoral scholars contribute significantly to most scientific advances and are indispensable professional members of the S&E workforce. To ensure that postdoctoral scholars receive the support and benefits recommended by this principle, it is essential to define the term “adequate.” The NPA urges the OSTP to methodologically determine and explicitly define the standards of salary and benefits that should be adhered to when awarding postdoctoral fellowships.

PRINCIPLE: Federal Agencies Should Collaborate in Areas of Common Interest.

NPA Response: The availability of important data regarding postdoctoral scholars is lacking as emphasized in several 2005 reports from the National Science Foundation (“Postdoctoral Appointments: Policies and Practices”) and the National Academies of Science (“Advancing the Nation's Health Needs: NIH Research Training Programs”, “Bridges to Independence: Fostering the Independence of New Investigators in Biomedical Research”). To ensure that postdoctoral scholars in the US receive the highest quality education and training, the NPA urges federal agencies to systematically evaluate the effectiveness of current and future training programs, including analysis of postdoc productivity, training participation, and career outcomes. Only with sufficient data collection by funding agencies can the effectiveness of training programs and funding mechanisms be accurately evaluated.

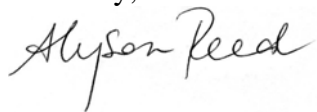
PROPOSED PROCESS: An interagency working group should coordinate federal training data.

NPA Response: The NPA recognizes the difficulty of this task and strongly encourages the Committee on Science to adopt the Education and Workforce Development Subcommittee’s proposal to establish the working group outlined in Section III to promote the principles established in Section II. The NPA

further suggests that the mission of the working group be extended to foster efforts within federal agencies to develop data collection, analysis, and reporting that tracks the current status and career outcomes of postdoctoral scholars supported with US funds.

SUMMARY: The NPA commends the OSTP for creating the Education and Workforce Development Subcommittee to investigate these issues and for initiating the dialogue necessary to embark on the development of standards for federal support of graduate and postdoctoral education and training in S&E. The NPA appreciates the magnitude of this task and recognizes that needed changes will not be easily implemented due to the numerous factors to consider and the continuing need for fiscal responsibility. However, the NPA believes that only by explicitly defining the terms in these principles will the goals of this notice be accomplished. The NPA also urges the OSTP to encourage federal agencies to develop programs that support these principles and move towards implementing them within the next two years.

Sincerely,

A handwritten signature in cursive script that reads "Alyson Reed".

Alyson Reed
Executive Director