April 7, 2023

Lawrence A. Tabak, D.D.S., Ph.D.
Acting Director
National Institutes of Health
9000 Rockville Pike
Bethesda, Maryland 20892

RE: Request for Information (RFI) on Re-envisioning U.S. Postdoctoral Research Training and Career Progression within the Biomedical Research Enterprise (NOT-OD-23-084)

Dear Dr. Tabak:

The National Postdoctoral Association (NPA) is pleased to provide the following comments in response to the above-referenced Request for Information regarding postdoctoral research training and career progression. As the national voice of the postdoctoral community in the U.S. for the last twenty years, the NPA is uniquely positioned to provide information that reflects its status as a membership association of approximately 250 research institutions and 25,000 postdoctoral scholars, the majority of whom are professionals in the life sciences.

It is difficult to imagine a topic undertaken for research and review in the training and professional development arena more in line with the work of the NPA. Our mission is to improve the postdoctoral experience by supporting a culture of inclusive connection. At the individual, organizational, and national levels, we facilitate enhanced professional growth, raise awareness, and collaborate with stakeholders in the postdoctoral community.

Critical changes are needed in how the NIH and other institutions interface with postdocs, from compensation to inclusion. Today we have an opportunity to help reshape the postdoctoral landscape for the better, and the NIH stands as the leading government entity to lead such change, with organizations such as the NPA more than willing to carry their weight.

The national voice of the postdoctoral community
www.nationalpostdoc.org
We gratefully acknowledge the work of the Advisory Committee to the Director Working Group on this topic and the leadership of Tara A. Schwetz, Ph.D. and Shelley Berger, Ph.D., and recognize both the contributions of the members of this working group and its staff members, Joel Islam, Ph.D. and Laura Long, Ph.D.

**NPA Responses:**

1. Perspectives on the roles and responsibilities of the academic postdoc (e.g., what the postdoctoral position means to you, how you view it).

- **Postdoc definition**
  - The NPA and NIH jointly developed the definition of a postdoc. NIH should adhere to a consistent universal definition of a "postdoc" regardless of funding mechanism. "Trainee" is seen as diminutive by many, and should be avoided, while “scholar” or “fellow” is more appropriate.

- **Gain independence and skills**
  - NIH postdoc positions should facilitate research independence and promote development of technical and non-technical skills. All postdocs should have access to professional development training in management (personnel, budget, administrative), leadership, teaching, science communication, grant-writing, new experimental techniques, career exploration, and other transferable skills.
  - Postdocs should work in an environment that fosters new skills and expertise, encourages creativity, and allows flexibility to explore new research areas to maximize personal and professional growth.
  - Postdocs should have protected time and funds to attend at least one scientific or professional development conference annually to explore new concepts, share knowledge and perspectives, and network.

- **Better role definition**
  - Postdocs are usually intent on entering different positions after a defined period of time unlike permanent staff. Establishing clear expectations at the offer of appointment for both postdocs and their PI’s regarding their role and how it differs from staff scientists will alleviate misunderstandings.
  - Requiring postdoc and PI participation in formal performance reviews as part of an NIH award will better define, formalize, and evaluate factors of role, mentorship, and professional development, while differentiating postdocs from staff scientists.
  - The NPA’s 2023 Postdoctoral Barriers to Success (“Barriers”) reported most postdocs are negatively affected by a lack of professional development opportunities (81.7%) and intellectual freedom (71%). NIH should establish a minimum percentage of postdoc time to be devoted to service, mentoring and professional development activities. This will assist postdocs, PI’s, mentors, and postdoc office (PDO) leaders in creating a climate for success. Additionally, the
NIH should provide tools to assist academic institutions in adhering to these requirements and incentivize compliance.

2. Fundamental issues and challenges inhibiting recruitment, retention, and overall quality of life of postdoctoral trainees in academic research.

- **Compensation**
  - The Barriers report indicates salary has a negative impact on 95% of postdocs’ professional and/or personal lives. Higher postdoctoral salaries will assist those who wish to contribute to academic research and innovation, but struggle financially. The NIH should increase its stipends to postdocs on NIH training and fellowships grants to match the GS-10 federal pay schedule including locality pay. Using “Rest of U.S.” locality levels, the 2023 NIH minimum award would be $62,898, with higher amounts in defined areas. Year 0 postdocs should receive stipends equivalent to GS-10 Step 1, with annual step increases. Similarly, the NIH should promote minimum salary requirements for all NIH-supported postdocs that provide a living wage adjusted annually for inflation, location, and tenure.

- **Insufficient DEIA**
  - Academia contains remnants of structural biases and institutional barriers that hinder the success of scholars from historically-marginalized groups still today. Postdocs from historically-marginalized groups and international postdocs face increased structural and implicit barriers including: lack of inclusion, reduced resources, implicit bias, and loss of community, while often managing increased familial commitments and additional financial responsibilities.

- **Environment**
  - NIH should hold institutions accountable for fostering inclusive and supportive training environments, including expanding the current requirement for institutional commitment to preventing discrimination and harassment (https://grants.nih.gov/grants/guide/notice-files/NOT-OD-19-056.html) to include mental health and wellbeing support.
  - NIH should require a percentage of indirects on all NIH grants supporting postdocs to provide postdoctoral offices (or offices with similar oversight) with increased resources to foster stronger postdoctoral communities.

- **Support international postdocs**
  - International postdocs face unique challenges; the Barriers report shows 86% were negatively impacted by cultural transitions into the U.S. NIH should work with the State Department and USCIS to accelerate and simplify the visa and immigration process for postdocs and expand funding opportunities to internationals through K99/R00 and other programs.

3. Existing NIH policies, programs, or resources that could be modified, expanded, or improved to enhance the postdoctoral training ecosystem and academic research career pathways.
• **Postdocs need equitable benefits**
  - Postdocs deserve equitable benefits regardless of funding source. NIH should issue written guidance explaining that the mere fact of a postdoc receiving an NIH grant or fellowship does not prevent the host institution from categorizing such postdoc as an employee. (Other implications, such as tax, do not stem from NIH.)
  - NIH should require that all postdocs receive employee-level benefits as a requirement of NIH training/fellowship grants, similar to some NASA and NSF requirements, and provide funding to institutions to offset costs. NIH could allow PIs to supplement fellowships from their NIH RPG funds.
  - NIH should expand its family-friendly policies to all NIH-supported postdocs, including paid parental leave and childcare subsidies. The NIH should expand its child care subsidy program for intramural postdocs to all NIH-supported postdocs to a $10,000 annual maximum, adjusted for household size and income.
  - To increase equity, NIH should provide NIH-funded postdocs with moving allowances.

• **Quality mentorship**
  - NIH should institute substantial, reportable grant requirements for mentorship training for NIH-funded PIs, menteeship training for postdocs, and mentoring committees at all institutions receiving NIH funding, similar to those provided under NIH mentored training programs. Such training should be offered to non-PI’s acting as postdoc mentors.

• **Increase staff scientist opportunities**
  - Postdocs’ difficulties to remain in academia due to limited faculty positions contributes to dissatisfaction. To retain top research talent, NIH should create or expand programs to support staff scientist positions in academic labs. This would benefit academia by maintaining continuity of lab knowledge, providing additional career options for postdocs while differentiating between postdocs and staff scientists.

• **Data collection**
  - Collecting metrics on postdoc satisfaction on an annual basis will position NIH to adjust policy accordingly based on the needs of postdoctoral researchers. These data will not only provide key insights on policy effectiveness, but will allow postdocs to provide honest, anonymous feedback without retaliation.

4. **Proven or promising external resources or approaches that could inform NIH’s efforts to enhance the postdoctoral training ecosystem (e.g., improving postdoctoral recruitment, training, working environment, mentoring, job satisfaction).**

• **NPA resources**
  - The NPA has a wealth of resources developed by committees consisting of postdocs, PDO leaders, and other contributors. By combining the lived experiences of postdoc training from multiple perspectives, NPA resources
provide well-balanced and comprehensive tools, knowledge and advice. The NIH Working Group should refer to the following resources in particular: NPA Recommended Postdoctoral Policies and Practices (updated version to be released Q3 2023), the triennial NPA Institutional Policy Surveys from the last decade (2023 report to be released Q3 2023).

- **Consolidate professional development resources**
  - Currently, institutions and NIH IC’s each develop their own professional development resources, leading to inequity while inefficient in time and money. NIH should provide a centralized hub linked to the publicly available resources from NPA, PDHub, OITE, professional societies, and individual ICs/universities. In an increasingly virtual environment, a well-maintained comprehensive hub should be searchable and accessible to enhance a postdoc's personal, scientific, and professional development. This would complement federal commitments toward open science by increasing not only the availability and access of federally-funded research but also its community resources.

- **Engage with key stakeholders**
  - We encourage NIH to work closely with institutions that host postdocs and NPA on an ongoing basis to consult on institutional policy adjustments and tool development that are needed to complement public policy change.

- **NIH work to date**
  - We applaud NIH’s policies and programs that have progressed postdoc training to date, including offering OITE resources to external audiences, promoting DEIA through COSWD and UNITE, tailored training programs like MOSAIC and IRACDA, and supporting reentry and reintegration supplements for scientists with career gaps. We encourage additional funding for these efforts.

Thank you again for the opportunity to submit these comments. I would be happy to answer any questions regarding the above material at [kimbis@nationalpostdoc.org](mailto:kimbis@nationalpostdoc.org). The NPA is proud to work with the NIH and our peer organizations to advance the well-being of postdoctoral scholars and to move closer to our organizational vision of an inclusive community where all postdocs are empowered, valued, recognized, and supported in their current and future endeavors.

Sincerely,

Thomas P. Kimbis, J.D.
Executive Director and Chief Executive Officer

*The national voice of the postdoctoral community*

[www.nationalpostdoc.org](http://www.nationalpostdoc.org)