



April 14, 2023

**COGR Response to Request for Information (RFI): Re-envisioning U.S. Postdoctoral Research Training and Career Progression within the Biomedical Research Enterprise [NOT-OD-23-084]**

Submitted electronically to: <https://rfi.grants.nih.gov/?s=639675dcf6d8bc7e840ce9c2>

The Council on Governmental Relations (COGR) is an association of over 200 public and private U.S. research universities and affiliated academic medical centers and research institutes. COGR concerns itself with the impact of federal regulations, policies, and practices on the performance of research conducted at our member institutions. As recipients of a significant portion of NIH extramural research funding, the COGR membership values the opportunity to respond to the request. Of particular interest to our members are the areas identified below. We offer the following comments for consideration.

*Existing NIH policies, programs, or resources that could be modified, expanded, or improved to enhance the postdoctoral training ecosystem and academic research career pathways [<300 words].*

**Increase Modular Budget Cap.** COGR's recent letter<sup>1</sup> addresses the limitations of the modular budget cap, and we *recommend raising the current modular cap (\$250,000) or eliminating the direct costs cap altogether* (allowing for all applications to utilize the modular budget format). The number of modular applications significantly declined since implementation (90% in 1998 compared to 29% in 2021), and have limited ability to fully support all research activities (i.e., mentoring activities and funding multiple trainees). This is of particular concern within the context of other recommendations being considered by NIH. Modular budgets are steadily squeezed in absorbing increased activities (i.e., DMS<sup>2</sup>) and the cost to support personnel and trainees critical to individual projects.

**Increase NRSA Stipend Levels.** We support comments shared by the community and postdoctoral trainees recommending that the *National Research Service Award (NRSA) stipend*

---

<sup>1</sup> December 2022

[https://www.cogr.edu/sites/default/files/FINAL%20COGR\\_Modular%20Tabak%20Letter%20November%202022%20%28002%29.pdf](https://www.cogr.edu/sites/default/files/FINAL%20COGR_Modular%20Tabak%20Letter%20November%202022%20%28002%29.pdf)

<sup>2</sup> December 19, 2022 [https://www.cogr.edu/sites/default/files/DMS\\_COGR\\_Policy\\_Review\\_Dec19\\_final.pdf](https://www.cogr.edu/sites/default/files/DMS_COGR_Policy_Review_Dec19_final.pdf)

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

---

**levels be increased.** Increasing stipends would improve recruitment and retention and provide a living wage for trainees. Current stipend levels are insufficient in the current market and fail to account for inflation and the cost of living.

**Consider More Equitable Benefits.** NRSA fellows are compensated through stipends rather than salary, which has numerous tax and benefit ramifications for post-docs. Stipend pay limits full recognition of their work at institutions and the research enterprise at-large. *NIH should engage the community on postdoctoral classifications (e.g., stipend vs. salary) and impacts on recruitment and retention* to consider policy clarifications or revisions.

**Reevaluate NRSA Policies.** Laws governing the NRSA were established in 1974, and subsequent policies remain largely unchanged. *NIH should engage with the community to identify specific policy areas that can be clarified or revised*, including financial policies (i.e., see above) and areas to reduce administrative burden for trainees (i.e., payback obligations), mentors, and institutions.