



April 14, 2021

Subject: *Response to NIH's RFI on Suggestions to Advance and Strengthen Racial Equity, Diversity, and Inclusion in Biomedical Research and Advance Health Disparities and Health Equity Research (NOT-OD-21-066)*

Submitted Electronically via [RFI Submission Website](#)

To Whom It May Concern:

The Council on Governmental Relations (COGR) is an association of 190 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 its member institutions.

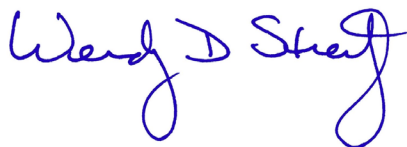
COGR appreciates the opportunity to provide feedback on the approaches NIH can take to advance racial equity, diversity, and inclusion within all facets of the biomedical research workforce and expand research to eliminate or lessen health disparities and inequities. We applaud NIH leadership for the UNITE initiative to end structural racism and racial inequities in biomedical science. As an organization representing diverse research institutions, COGR can play a role in advocating for change on this very important issue.

We offer the following suggestions in response to the RFI:

- As new policies are created or existing ones modified, NIH and all NIH Institutes and Centers (I/Cs), as a standard practice, should proactively and continuously engage the full spectrum of the administrative research community, with strong representation from under-resourced and less research-intensive institutions to gain an understanding of the obstacles they may uniquely face in implementing a new or changed policy. This practice will allow the agency to identify and mitigate unintended consequences and biases prior to policy and practice implementations that would negatively impact investigators, particularly those with limited research and administrative resources. This could also result in increased proposal success rates for less research-intensive institutions applying for financial assistance awards.

- Routinely evaluate and standardize existing policies, procedures, and practices with a committee comprised of researchers and research administrators, including broad representation from under-resourced and less research-intensive institutions. Regularly evaluate the effectiveness of the NIH-supported Diversity Program Consortium (DPC) and promote best practices learned. If the program is found to be effective, NIH should consider further investment in and/or expansion of the DPC.
- Scientists from diverse backgrounds are often interested in biomedical problems that disproportionately affect their communities. Consider encouraging applicants and study sections to note and emphasize the importance of these lines of research and add them to the evaluation criteria of a project's significance.
- Set goals on the maximum number of estimated hours consumed by administratively burdensome activities, particularly on lower-resourced grantees. Recognize that emerging research institutions, including Historically Black Colleges and Universities (HBCUs) and other Minority Serving Institutions (MSIs), are disproportionately impacted by the 26 percent administrative cap applicable to F&A cost reimbursement. While all research institutions are adversely impacted by the 26 percent administrative cap, emerging research institutions do not have the benefit of economies of scale associated with larger scale research operations and are more significantly disadvantaged.
- Create a fellowship type program that would match scientists from minority serving institutions with mentors in their field.
- Develop best practices on reducing impediments when enrolling patients in studies. For example, ensure site selection and time and resource constraints are considered when conducting observational and clinical trials with minority populations. Conduct studies and collect data on screen failures related to inclusion/exclusion criteria.

Thank you for the opportunity to provide some suggestions on these important issues. Please contact Jackie Bendall at [jbendall@cogr.edu](mailto:jbendall@cogr.edu) if you have further questions.

A handwritten signature in blue ink that reads "Wendy D. Streit". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

Wendy D. Streit  
President