



April 3, 2022

Subject: *Response to NIH's RFI on Suggestions on the Draft NIH Chief Officer for Scientific Workforce Diversity Strategic Plan for FY 2022-2026* ([NOT-OD-22-061](#))

Submitted Electronically via [RFI Submission Website](#)

To Whom It May Concern:

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

COGR appreciates the opportunity to provide feedback on the approaches NIH can take to strengthen diversity, equity, inclusion, and accessibility (DEIA) across all NIH activities to achieve the NIH mission. We also appreciate Dr. Maria Bernard's recent participation at COGR's March 1st meeting, where she shared NIH's plans and activities in progress to strengthen DEIA. COGR plays a vital role in advocating for change on this critical issue, and our member organizations are moving in similar directions as the NIH.

We offer the following suggestions in response to the RFI:

Objective 1: Implement Organizational Practices to Center and Prioritize DEIA in the Workforce

Research institutions have taken many steps to increase opportunities and diversity in our research workforce. In some cases, these activities have been ongoing for several years¹. Examples include increasing recruitment of faculty, staff, and students from diverse groups, creating and expanding inclusive environments, extending external partnerships, creating DEI-focused positions, and providing more diverse educational offerings. As a result, we do not see the need for additional regulation for the grantee community.

¹ Detailed information of diversity, inclusion, equity and access programs:
Michigan State University - <https://president.msu.edu/initiatives/dei-plan/dei-report-and-plan.html>
University of Michigan - <https://diversity.umich.edu/strategic-plan/dei-2/>
Brown University - <https://diap.brown.edu/about>
University of Wisconsin - <https://diversity.wisc.edu/reports-policies/#diversity-framework>

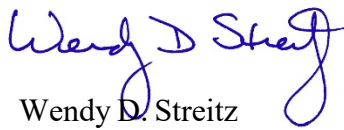
Objective 2: Grow and Sustain DEIA through Structural and Cultural Change

COGR has offered some of these suggestions in the past. However, we strongly believe that engagement with the large cross-section of the research community will yield better results as NIH continues to engage the community for feedback on new policies and programs. We suggest routine and regular evaluation and harmonization of existing policies, procedures, and practices with an external advisory group comprised of researchers and research administrators, including broad representation from under-resourced and less research-intensive institutions, including R2 and R3-level institutions. These are essential perspectives and will help funding agencies appreciate the obstacles they may uniquely face in implementing policies.

Further, 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 affected by the 26 percent administrative cap, emerging research institutions do not benefit from economies of scale associated with large-scale research operations, nor do they have reserve resources, and therefore are more significantly disadvantaged.

Scientists from diverse backgrounds are often interested in biomedical problems that disproportionately affect their communities. This offers NIH the opportunity to encourage 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.

Thank you for the opportunity to provide some suggestions on these important issues. Please contact Michelle Christy at mchristy@cogr.edu if you have further questions.



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President