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October 18, 2012

Francis S. Collins, M.D., Ph.D.
Director
National Institutes of Health (NIH)
Building 1 - Shannon Building, 126
1 Center Dr
Bethesda, MD

cc: Shirley Tilghman, Ph.D., and Sally Rockey, Ph.D., Co-Chairs, NIH Advisory Committee to the Director (ACD) Biomedical Workforce Working Group

Dear Dr. Collins,

On behalf of the National Postdoctoral Association (NPA) Board of Directors, we are writing today to express our support of recommendations outlined in the National Institutes of Health (NIH) Advisory Committee to the Director Biomedical Research Workforce Working Group Report of June 14, 2012.

We highly commend the members of the working group for their careful consideration of all available data and thoughtful execution of their charge. We believe that the public had ample opportunity to provide critical input, and we very much appreciated the opportunity to share our own thoughts in this regard.

Importantly, the working group's report has already impacted support of postdoctoral researchers in a positive manner. A number of NPA-member postdoc office administrators have reported that their institutional leaders have initiated efforts to prepare for the implementation of recommendations. Such efforts include tracking career outcomes for postdoctoral researchers, providing diverse professional and career development opportunities, and establishing a process for the use of individual development plans (IDPs).

We especially applaud the working group's recognition of the following:

1. Graduate and postdoctoral training should include elements that prepare new researchers for "greater diversity in anticipated career outcomes" and educate them about the realities of available career paths;
2. There is a need for a change in the definition of success to include non-academic outcomes;
3. Postdoctoral training programs should allow non-academic career track training at extramural institutions.

Since at least 2009, the NPA has been encouraging graduate students and postdocs to consider all of their career options and has refrained from using the language “alternative careers.” In response, many NPA-member PDOs have worked to offer diverse professional development opportunities. We believe that such efforts are essential to ensure the stability of the future biomedical workforce.

In regard to the working group’s specific recommendations for support of postdoctoral researchers, we fully endorse the following.

To ensure that all postdoctoral fellows supported by the NIH receive excellent training and mentoring, NIH should increase the proportion of postdoctoral researchers supported by training grants and fellowships and reduce the number supported by research project grants, without increasing the overall number of postdoctoral researchers. We understand that many in the research community have concerns regarding this recommendation and its short-term impact on U.S. research productivity. We counter this concern, however, by taking a long-term view of research productivity. As noted in the report, T32/F32 training programs have been shown to have positive outcomes regarding the preparation of the workforce. Furthermore, the presence of training programs at institutions has been shown to improve conditions for the entire community of postdocs at those institutions. Thus, in the long term, implementing this recommendation should lead to a better prepared and more productive workforce and to improved retention of the best and brightest scientists. The NPA therefore strongly supports this recommendation and suggests that the proportional increase focus primarily on training fellowships, given that there is data showing that NRSA fellows fare better in terms of applying for and receiving NIH research awards within ten years of completing their fellowships than other postdocs.

Create a pilot program for institutional postdoctoral offices to compete for funding to experiment in enriching and diversifying postdoctoral training, including partnerships with other entities (industry, private foundations, government, etc.). The NPA applauds this recommendation, which recognizes the important role that postdoctoral offices (PDOs) can play in developing a diverse workforce. The PDO usually leads institutional efforts to support postdocs and can be an invaluable resource for principal investigators (PIs) by providing diverse professional and career development opportunities for their trainees. Such a competitive pilot program would provide incentive for NIH-funded institutions without PDOs to establish a central office that supports postdoc fellows.

Require and adjust [NIH] policies so that all NIH-supported postdoctoral researchers on any form of support (training grants, fellowships or research project grants) receive benefits that are comparable to other employees at the institution. Such benefits include paid time off, health insurance, retirement plans, maternity leave etc. Based on the NPA’s interactions with postdocs, this recommendation could have the most significant impact in terms of career-path satisfaction and retention of the best and brightest in the U.S. research workforce. In its response to the working group’s *Request for Information* (RFI), the NPA noted that institutions face difficulties when trying to provide equitable benefits to all postdocs. Many such issues are caused by the differing policies among types of support; and so we highly encourage the implementation of this recommendation.

Double the number of Pathway to Independence (K99/R00) awards and shorten the eligibility period for applying to this program from the 5 years to 3 years of postdoctoral experience. The NPA supports doubling the number of Pathway to Independence awards and reducing the eligibility period from 5 years to 3 years. We also recommend, however, that there be a gradual, phased implementation of the eligibility reduction.

Double the number of the NIH Director's Early Independence awards to facilitate the "skip-the-postdoc" career path for those who are ready immediately after graduate school. The NPA recognizes that the postdoc may not be a necessary step in the career path for everyone. Additionally, any competitive effort that provides another avenue of career advancement for new researchers is to be commended.

Collect information on the career outcomes of both their graduate students and postdoctoral researchers, and provide this information to prospective students/ postdoctoral researchers and the NIH. Such information should include completion rates, time to degree, career outcomes for PhD trainees, as well as time in training and career outcomes from postdoctoral researchers over a 15-year period.

Address, working with other agencies in the Federal Government, the identified data gaps and collect information on the biomedical and scientific workforce on an ongoing basis.

Create a permanent unit in the Office of the Director that works with the extramural research community, the National Science Foundation (NSF) and the NIH ICs to coordinate data collection activities and provide ongoing analysis of the workforce and evaluation of NIH policies so that they better align with the workforce needs.

The NPA has long pushed for better data collection. Accordingly, the NPA enthusiastically supports all three of these recommendations. We do have one caution: The NIH should not allow the call for more and better data to delay progress in implementing the other recommendations in the report. Too often, "not enough data" is used as an excuse to keep moving down well-known but ineffective paths; there comes a time for change and action based upon the best available data. In the NPA's opinion, research workforce development has reached that moment when the need outweighs the risk.

In regard to these three recommendations, we would encourage an immediate focus on gathering data about postdoctoral researchers in the United States who have earned their degrees from non-U.S. institutions. We would also highly encourage the dissemination of information regarding career outcomes to prospective students and postdoctoral researchers. NPA representatives regularly talk to graduate students as well as postdoctoral researchers regarding the benefits and challenges of the postdoc experience, and we have seen a great need for the sharing of information that allows these students and researchers to make better choices for their career paths.

[Recognize] the need for much stronger coordination of the many diversity-related efforts at the NIH and for rigorous evaluation of the outcomes of all programs. The NPA supports this recommendation and encourages the NIH to be sure to consider the needs of postdocs with disabilities, an underrepresented group that is often overlooked in the pursuit of diversity. There is little understanding in the research community about providing accommodations to postdocs with disabilities. The NPA's interactions with biomedical and behavioral postdocs with disabilities suggest that these postdocs are usually expected to bring funding with them to support any needed accommodations and that they face unique challenges in the research environment.

The working group encourages NIH study sections to be receptive to grant applications that include staff scientists and urges institutions to create position categories that reflect the value and stature of these researchers. Providing an alternate career path for postdocs who do not want to pursue the PI/faculty career path but who wish to remain in academic research is crucial to maintaining a quality workforce. The NPA recognizes the challenges faced by such an effort, such as convincing PIs and universities that

hiring staff scientists will be worth the extra investment and grant reviewers that the inclusion of such positions could improve productivity. Nevertheless, we fully support this recommendation.

We endorse the following recommendations for the support of postdoctoral researchers with some modifications.

Require individual development plans (IDPs) for all NIH-supported postdoctoral researchers, whether on training grants, fellowships, or research project grants. Assessment of implementation of this requirement should be included in the review criteria of training grants. Perhaps one of the most important steps in improving the postdoc experience to date has been the adoption of a definition of “postdoc” by the NIH and the National Science Foundation (NSF) in 2007: “...an individual who has received a doctoral degree (or equivalent) and is engaged in a temporary and defined period of mentored advanced training to enhance the professional skills and research independence needed to pursue his or her chosen career path.” The NIH has previously taken steps to support this definition in its own policies, for example, in regard to guidelines for the National Research Service Awards (NRSAs). This recommendation has now brought this definition to bear on NIH policies for non-training research grants.

The NPA supports this recommendation and has long recognized the value of the IDP. We appreciate that this requirement would provide incentive for the establishment of institutional policies requiring annual performance reviews for all postdocs. We believe, however, that the research community would be served best by the broader requirement of a mentoring plan on all research grant applications that include financial support of postdocs, as well as an assessment of the impact of such plans. Certainly, an important element of such a plan could be the IDP. While requiring an IDP provides an avenue of communication between mentor and postdoc regarding their intersecting short-term and long-term goals, an IDP in itself may not necessarily improve the overall mentoring environment. The requirement of a mentoring plan would provide a more comprehensive framework that might include, in addition to the IDP, attendance at professional development workshops, developing a mentoring network, or the use of peer mentoring. Requiring a mentoring plan might provide incentive for institutions to open their doors more widely to postdocs and allow postdocs to take advantage of resources not usually offered to them (e.g., career services).

Adjust the starting stipend levels of the Ruth L. Kirschstein National Research Service Awards (NRSA) to \$42,000 and index the starting stipend according to the Consumer Price Index (CPI-U) thereafter. Stipend levels should increase with each year of experience in any postdoctoral position irrespective of their titles by 4% for the second and third years and 6% for years 4 through 7. The NPA greatly appreciates that the starting stipend levels have been increasing since 2009 in spite of less than desirable funding for the NIH, and we view this recommendation as another step in the right direction. We applaud indexing the starting stipend to the CPI-U and increasing stipend levels relative to experience. We would strongly recommend, however, that the NIH adhere to its original promise to bring the starting stipend level to \$45,000.

As part of this recommendation, the working group noted that if the postdoctoral period has not been shortened in coming years, the NIH might need to consider placing a cap on the length of funding for postdoctoral researchers. Through the NPA’s work funded by a National Science Foundation (NSF) ADVANCE-PAID grant, we have learned of the hardships that such caps can cause for women who want to start a family, hardships that data suggest hinder the retention of women in science. We encourage

the NIH to keep this concern foremost when establishing policies governing any future term limits and allow exceptions to the cap for family leave.

The NPA is willing to discuss these modifications at length with the NIH and to work with the NIH and other entities to ensure that the working group recommendations are implemented in the best possible way. We recognize that some of the recommendations will require reallocation of NIH funding, but we believe that such an investment in quality rather than quantity is necessary and prudent to ensure the sustainability of the biomedical workforce and its research endeavors.

Please do not hesitate to contact us with questions, comments, or requests for participation. Thank you so much for your time and consideration—and for your support of postdocs.

Sincerely,

The NPA Board of Directors Executive Committee



Lorraine Tracy, Ph.D.
Chair, NPA Board of Directors



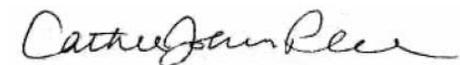
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