



April 19, 2013

The Biophysical Society submitted the following comments in response to an NIH issued a Request for Information on its Implementation Plans for Recommendations of the NIH ACD Working Group on the Biomedical Research Workforce.

### **Gathering information on NIH-supported graduate students and postdocs**

The Biophysical Society's public affairs committee agrees that in order to move forward in creating a sustainable workforce, attention has to be paid to the training of students and postdoctoral fellows. As the working group discovered in creating its report, there is very little data available about trainees, including their work conditions, salaries, benefits, time to degree, and career outcomes. While we see the importance of data, we are concerned about the undue burden collecting such data will place on principal investigators. Thus, we ask NIH to be very cautious in moving forward so that more requirements do not result in principal investigators having less time to research, teach, and mentor. We also suggest NIH consider using data already being collected by accrediting organizations such as ABET / SACS (Southern Association of Colleges and Schools) to avoid duplication of effort. Using this already available data will reduce much of the "additional" burden.

### **Reporting of Career Outcomes**

While the tracking of career outcomes would provide valuable information to potential students, collecting this information in a meaningful way will be very difficult. To have a true picture of what happens to trainees, NIH would need information on students at least ten years post degree, since it often takes this long for a researcher to receive his/her first grant. Without tracking for that length of time, it will be impossible to tell if individuals end up as

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independent investigators. In addition, it will be especially difficult to track individuals who leave the US or leave science. Again, we ask that NIH think through the burden tracking will place on principal investigators as well as the cost, which could take funds from actual research and training.

### **Individual Development Plans**

In order to be prepared for a variety of careers, students will need opportunities to develop skills such as teaching, science writing, information technology, or business. Individual development plans are critical in making sure students are given the opportunity to acquire these skills and in making students an active partner in their training, as opposed to a recipient of the training. We encourage NIH to establish guidelines, and potentially to include IDPs in the grant proposal. However, we are concerned that requiring annual updates to the NIH will place an additional and excessive burden on the PIs. It may be appropriate to have all graduate students supported by NIH dollars sign a contract stating that they will provide annual follow up. For those students supported entirely by research project grants, the NIH must address how non-research activities can be supported.

### **Training Grant review considerations**

Changing the measures by which training grants are evaluated is imperative to making sure institutions pay attention to the areas above. Reviewers should be directed to consider the percent of students that graduate “on time” and the quality of the IDP process/support/implementation when reviewing applications. They should also be instructed to view a broader array of career outcomes as successes of the program. Since NIH’s mission is “to seek fundamental knowledge about the nature and behavior of living systems and the application of that knowledge to enhance health, lengthen life, and reduce the burdens of illness and disability,” jobs related to that goal should be seen as successes. This includes jobs such as science writing, grants management, teaching positions, staff scientists, and policy advisors, among others.