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ASPET comments in response to NOT-OD-23-084, "Request for Information (RFI): Re-envisioning U.S. Postdoctoral Research Training and Career Progression within the Biomedical Research Enterprise."

Comments submitted electronically via online Submission Form on April 14, 2023

Perspectives on the roles and responsibilities of the academic postdoc (e.g., what the postdoctoral position means to you, how you view it).

The shared NIH and NSF postdoc definition is "an individual who has received a doctoral degree (or equivalent) and is engaged in a temporary and defined period of mentored training to advance and enhance the professional skills and research independence needed to pursue his or her chosen career path."

ASPET believes that an academic postdoc position should be an established and temporary period that has defined goals for the advancement and enhancement of professional skills needed to pursue his or her chosen path whether it is in academia, industry, government, or another area.

The referencing of postdocs as "trainees" could have undermining values. Particularly, referencing postdocs and graduate students as "trainees" may devalue and fail to demarcate the training and expertise that a PhD scientist has earned through his or her graduate training years. The terminology "trainee" is also detrimental for international postdocs obtaining visas dedicated to a career that advances PhD-level scientists. Further, referencing postdocs as trainees could muddle the power dynamic in a professional environment, which may pose challenges for postdocs to exercise and reinforce supervisory and mentorship roles that are sometimes expected of postdocs.

Per the NIH, if postdoctoral training is intended to be a "defined period to enhance professional skills", then professional development should be mandated and incorporated into the stipulated postdoctoral period and be valued equally to the conduct of research. Currently, professional development is left to the postdoc to initiate of their own accord, time, and at their own expense outside of the lab, provided their supervisor approves of their external professional developments.

The entirety of the postdoc role is to provide for the individual to "pursue his or her chosen career path," not just those careers paths in academia. NIH should strongly encourage the exploration of careers outside of academia.

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Fundamental issues and challenges inhibiting recruitment, retention, and overall quality of life of postdoctoral trainees in academic research.

The current system needs close oversight that will assist in mitigating some of the concerns outlined below. Along with oversight, better surveying on the following areas will allow NIH to observe trends and take proactive measures before any pertaining issues escalate.

Inequities in postdoc pay create significant financial barriers that can lead to physical and mental health difficulties. Currently, accurate guidance on how postdocs can be paid is lacking from the NIH, which enables institutions to treat postdocs not as employees but independent contractors depriving them of standardized pay, benefits, and employment protection. This creates a barrier, such that only those that have the means to become a postdoc without suffering financial hardships pursue that career path.

Without clear guidance from the NIH on standardized benefits for postdocs, inequities in benefits have emerged within institutions and across institutions that create discrepancies in terms of quality of life. To sustain and enhance quality of life, more and more early career scientists are looking at careers outside of academia for a healthier work/life balance and a better paycheck that they believe they are worthy of.

The treatment as a “trainee” is degrading and disingenuous as much of the workforce looks at new PhDs as top candidates and employees and far from a “trainee.” These issues in a work environment manifest as prolonged work hours impacting work/life balance, strained mentee-mentor relationships, with bullying and harassment that can deter and drive postdocs to careers outside of academia. New PhDs would need to be recognized for their professional strengths and skills, rewarded with competitive salaries, enabling work/life balance.

Existing NIH policies, programs, or resources that could be modified, expanded, or improved to enhance the postdoctoral training ecosystem and academic research career pathways. [Current word count: 290 out of 300]

ASPET believes that NIH can and should create positive change. While NIH cannot step in to oversee every employer relationship, NIH can make the programs it has oversight over more structured and standardized, inclusive, and supportive of postdocs across institutions.

Scholars feel compelled to move institutions to advance their careers (and these types of biases are reinforced by reviewers and the [NIH FAQs for F32 applications](#)), but the NIH could change review criteria to allow for this type of continued training at the same institution. This would be useful for the development of postdocs into faculty, which NIH could help to [incentivize this transition](#). Thus, for those postdocs who want to stay in academia, this could be a mechanism to move from a temporary training period to full-time employment.

In addition to supporting increased diversity at the stage of postdoctoral transition to early career scientist through efforts like its "[MOSAIC](#)" awards, NIH should re-evaluate its [F32 grant](#) to increase diversity offerings. Only having [1 NIH IC](#) with a diversity award under the F32 grant does not increase diversity. However, the F31 has [a standard application and a diversity application](#). The NIH should look to expand the number or fields where these diversity opportunities are offered and that they should be expanded to other NIH ICs.

NIH should clarify language used for T32 training grants so that any postdoc who is listed as a trainee on a T32 grant is eligible for full benefits like their postdoc peers.

NIH should allow and promote the use of grant funds to help postdocs with relocation costs. Graduate students are financially disadvantaged to save up thousands of dollars to relocate for a postdoc position. Not providing relocation assistance creates inequities in the STEM ecosystem.

Proven or promising external resources or approaches that could inform NIH's efforts to enhance the postdoctoral training ecosystem (e.g., improving postdoctoral recruitment, training, working environment, mentoring, job satisfaction).

ASPET recognizes that many of the challenges rest within institutions, yet many of the solutions also are present there. NIH should work closer with institutions and keep institutions in mind when it is releasing guidance and directions.

ASPET recommends NIH:

- Work with external organizations that are focused on postdoc issues such as the National Postdoctoral Association and the National Black Postdoctoral Association and use them as resources to improve the postdoctoral experience.
- Strengthen its relationships with scientific associations that promote mentorship to foster a better mentorship education and relationship building between PIs and postdocs.
- Create a yearly mechanism, whether it is a survey or another reportable item within the funding grant, that will create a baseline for NIH and the public to view the postdoc experience especially regarding postdoc pay and benefits.
- Look to other fields that have similar training structures, such as the medical field, and incorporate best practices, such as limiting the number of hours qualitative worked, into the scientific training enterprise.
- Begin to treat the postdoc ecosystem not as a siloed institution, but cooperation with private industry and other areas, which will in turn strengthen recruitment and retention.