September 29, 2022

NSTC Subcommittee on Equitable Data
ATTN: Meghan Maury
Office of Science and Technology Policy
Eisenhower Executive Office Building
1650 Pennsylvania Ave. NW
Washington, DC 20504

Submitted electronically via email: equitabledata@ostp.eop.gov

Dear National Science and Technology Council Subcommittee on Equitable Data members,

The Federation of American Societies for Experimental Biology (FASEB) is composed of 28 scientific societies, which collectively represents over 115,000 biological and biomedical researchers. FASEB supports the White House Office of Science and Technology Policy (OSTP) efforts to advance equity for the LGBTQI+ community through data-informed policy decisions, published in the Federal Register on August 24.

Describing Disparities

Nationwide data on LGBTQI+ students and members of the workforce are lacking for science, technology, engineering, and mathematics fields. Therefore, it is difficult to ascertain the severity of specific disparities of interest, such as grant funding rates and other mechanisms of financial support, persistence in academia from undergraduate education through faculty position and tenure, and salary in various career pathways. To more accurately identify and address inequities, it is imperative that robust nationwide demographics are collection on sexual orientation and gender identity (SOGI).

FASEB has consistently recommended the National Science Foundation’s National Center for Science and Engineering Statistics (NCSES) include SOGI demographics on its surveys of scientists and engineers in training and in the workforce—the Survey of Earned Doctorates, Survey of Graduate Students and Postdoctorates in Science and Engineering, and Survey of Doctorate Recipients. Most recently, FASEB applauded NCSES for piloting SOGI questions on the National Survey of College Graduates, and echoed the need to implement SOGI data collection in other instruments. In a similar vein, FASEB’s latest comments to National Institutes of Health encouraged the Director of the Division of Biomedical Research Workforce to examine experiences of nonbinary scientists to detect barriers to success.
As is, LGBTQI+ scientists certainly exist in the scientific ecosystem and are likely underrepresented; however, we lack thorough, national data to find patterns and significant differences in funding and employment trends. Qualitative evidence, in addition to quantitative data, would also likely be beneficial to identify barriers. Only by first giving LGTBQI+ scientists the opportunity to report this aspect of their identity in national demographic surveys will stakeholders be able to make informed recommendations to support positive change.

**Informing Data Collections**

Several federal agencies already collect SOGI data, and have largely found that respondents do not find SOGI questions to be too difficult or sensitive to report. Therefore, FASEB encourages OSTP to act in its capacity as a unifier to facilitate scientific federal agencies in collecting SOGI data in a consistent manner. If the same methods are used across agencies, this may enable comparisons between data collected by different agencies.

NCSES previously cited concerns of privacy as a reason to not collect SOGI data in the Survey of Earned Doctorates, as these responses are viewable by the degree granting institution. FASEB is sympathetic to confidentiality apprehensions but suggests a solution that allows responses to potentially sensitive questions as optional. While this might initially lead to a suboptimal low response rate, SOGI demographic questions may become innocuous as the cultural narrative shifts to valuing the whole scientist, including personal identities. Appropriate explanation of why questions on identity are being asked and how the data will be used, and acknowledging of the sensitivity of the data may help encourage responses. Additionally, surveys already routinely collect information on very small racial populations—in all fields of study, there were only 97 American Indian or Alaska Native doctorate recipients in 2020 (Survey of Earned Doctorates Table 22). If it is permissible to collect these data, collecting data on LGBTQI+ scientists also should be acceptable. Nearly 8 percent of the adult population in the U.S. identifies as LGTBQI+, which far exceeds the approximately 1.7 percent of American Indian and Alaska Native persons in the U.S. population. Fostering a diverse scientific workforce should incorporate all aspects of diversity—sexual orientation and gender identity included.

The invisibility of LGTBQI+ scientists is problematic, particularly when considering mentoring and developing the next generation of talented researchers. The lack of data collection on these scientists perpetuates this problem. FASEB appreciates OSTP’s attention to the importance of collecting SOGI data and engagement with stakeholders.

Sincerely,

Kevin C. Kregel, PhD
FASEB President