



# FASEB

Federation of American Societies  
for Experimental Biology

## Representing Over 115,000 Researchers

6120 Executive Blvd., Suite 230, Rockville, MD 20852 | [faseb.org](http://faseb.org)

### **FASEB 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 5, 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 advanced training to enhance the professional skills and research independence needed to pursue his or her chosen career path.”

FASEB believes an academic postdoc position ideally:

- Is a short-term, defined, transitional period to independence;
- Recognizes the scientific expertise brought by the highly trained individual appointed;
- Has clear expectations between the postdoctoral scholar and research advisor for progress in both research and transferrable skills that enables the postdoc to take the next steps in their desired career pathway in a timely manner;
- Centers development of additional scientific expertise and professional skills as on-the-job training;
- Respects work-life integration and balance, giving appropriate consideration to the human aspect of a healthy, sustainable career in the biological and biomedical sciences enterprise.

A postdoc may be perceived, but FASEB asserts should not be viewed, as:

- A trainee lacking research proficiency;
- An inexpensive staff scientist;
- An individual automatically assumed to be pursuing a tenure track academic research career.

As NIH further explores the role of academic postdocs and potential changes to the definition and culture, FASEB encourages caution for potential downstream negative effects on vulnerable populations—particularly postdocs who are temporary visa holders.

At present, professional development beyond additional research skills varies widely for academic postdocs across the country by the individual, research advisor, and opportunities at the institution. Participation in such programs and activities may also be limited based on citizenship. Development during the postdoc period should serve as a bridge to the desired career.

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

A postdoc is not a career, it is a bridge to a career. This relatively undefined period is rife with instability. The “trainee” moniker assigned to postdocs could be harmless, but has routinely been used to justify treating postdocs poorly. Similarly, the “temporary” appointments of postdocs are also sometimes used as an excuse not to invest in postdocs. Some fundamental issues for recruitment, retention, and postdoc quality of life include:

- Variable strategies for employment classification and pay are used for postdocs across and within institutions, usually leading to inequities;
- Postdocs on fellowship, often classified as “trainees,” typically lose access to employee benefits, which can create disruptions in health insurance and other benefits;
- Postdocs can be in family planning and child-rearing years, making variable access to benefits, including parental leave and priority access to affordable on-site childcare, a particularly large barrier;
- Some postdocs have reached this life stage without any meaningful financial stability; differences in employment classification, including “temporary” status, may prevent postdocs from having an employer matched retirement account—vital for long term financial health;
- Newly minted PhDs are not treated as trainees in a vast majority of work sectors; this attitude in academia can have harmful effects for the overall inclusivity of the environment;
- There is no robust data on postdocs paid from grants—specifically, data on the national landscape of postdoc salary when not on fellowship and if any clear disparities exist for vulnerable populations;
- One-year contracts for postdocs can create unnecessary hurdles, especially for postdocs on temporary visas;
- Faculty jobs may have decreased appeal in an increasingly competitive funding environment;
- Scholars may feel expected to move institutions to advance their career, and acting on this belief can mean physically moving away from support networks, leading to increased potential for feelings of isolation.

***Existing NIH [policies](#), [programs](#), or [resources](#) that could be modified, expanded, or improved to enhance the postdoctoral training ecosystem and academic research career pathways.***

As the primary funder of biological and biomedical sciences, NIH is well-positioned to create positive change. The current system for funding postdocs is not conducive to a healthy scientific ecosystem. FASEB recognizes many key issues are primarily a result of actions by the employer, yet encourages NIH to explore creative solutions to better support postdocs. For example:

- Adjust the Grants Policy Statement (GPS) to expand allowable costs for benefits beyond health insurance and allow fellows to be supported from multiple federal sources—noting that had they not received the fellowship it is highly likely they would be carrying out the same work/project;
- Clarify GPS language, as possible, such that individual fellows can maintain an employer-employee relationship with the extramural institution and receive standard benefits;
- Change existing fellowship funding mechanisms to include meaningful experimental funds;

- Evaluate the purpose and function of traditional funding mechanisms such as the F32 and T32; following analysis, potentially shift focus to more innovative funding mechanisms;
- Create funding mechanisms that do not tie postdocs directly to individual advisors, and ideally do not require substantial preliminary data, akin to the [Katz ESI award](#), to foster research independence and dampen power dynamics;
- As feasible, create individual funding opportunities for international postdocs;
- Increase community awareness and utilization of [NIH Re-entry Supplements Program](#) to support retention and career progression of postdocs with caregiving responsibilities;
- Use [IRACDA](#) as a model program for ushering postdocs into a chosen career by further investing in IRACDA and piloting similar programs for transition to other employment sectors;
- Explore methods for senior PhDs to obtain postdoc positions more equitably, relying less on networks of their research advisors;
- When examining potential new programs and funding opportunities, emphasize improving the experience of the postdoc itself rather than only the end career goal.

***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).*** Many impactful resources for postdocs occur at the institutional level: postdoc specific policies pertaining to appointment process and orientation, term limits, salary, benefits, and more; maintaining and funding a postdoc office and postdoc association; tracking postdoc alumni; having family and retirement benefits; and similar. The human aspect of the postdoc, beyond the science, must be respected and supported as possible through benefits that increase work satisfaction such as adequate access to childcare, mental health care, wellness resources, and similar. FASEB recommends NIH consider:

- Strengthening relationships with extramural organizations dedicated to improving postdocs' quality of life, such as the National Postdoctoral Association, and partnering to encourage widespread adoption of already identified [recommended policies and practices](#);
- Working closely with extramural institution partners to ensure updates to the Grants Policy Statement are broadly communicated and appropriately understood, noting that university general counsel typically interprets language as conservatively as possible—often to the detriment of postdocs;
- Revisiting, and potentially altering, the NIH [Broadening Experiences in Scientific Training awards](#) with an emphasis on supporting postdocs, to bolster resources and infrastructure that may not otherwise exist at extramural institutions;
- Assess and possibly support institutional programs that emphasize postdoc [conversion to tenure track faculty](#);
- Incentivize extramural employers of postdocs to be true partners—committing to supporting postdocs financially, rather than relying one-hundred percent on soft funds for postdoc stipend/salary—while ensuring this does not result in postdocs being overly concentrated at highly resourced institutions.