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April 1, 2022

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Sent via email to: nihstrategicplan@od.nih.gov

To whom it may concern:

On behalf of the [Population Association of America \(PAA\)](#) and [Association of Population Centers](#), we are pleased to submit comments in response to the National Institutes of Health (NIH) [Request for Information \(RFI\): Inviting Comments and Suggestions on a Framework for the NIH-Wide Strategic Plan for Diversity, Equity, Inclusion, and Accessibility \(DEIA\) \(NIH Guide Notice NOT-OD-22-061\)](#).

PAA and APC are two affiliated scientific societies that together represent over 3,000 social and behavioral scientists, including demographers, sociologists, and economists who conduct research on the causes and consequences of population change, and the over 40 federally supported population research centers nationwide. Population scientists, working in applied and academic sectors, conduct research on a wide range of topics, such as mortality, morbidity, fertility, adolescent health, aging, population forecasting, immigration, and family dynamics. The National Institutes of Health (NIH) is the largest source of discretionary, competitive grant funding supporting population research and research training activities.

Given the significant role NIH plays in supporting our field, PAA and APC have an intrinsic interest in the agency's efforts to expand research and research training opportunities to underrepresented scholars and populations. To that end, our organizations, with leadership from the PAA Diversity, Equity, and Inclusion Committee, responded to the [NIH UNITE initiative RFI](#) and are pleased NIH continues to seek our input as it works to strengthen diversity, equity, inclusion, and accessibility in the scientific research workforce. Our comments address the three major objectives of the proposed NIH DEIA strategic plan: (1) Implement Organizational Practices to Center and Prioritize DEIA in the workforce; (2) Grow and Sustain DEIA through Structural and Cultural Change; and (3) Advance DEIA Through Research.

Implement Organizational Practices to Center and Prioritize DEIA in the workforce

We applaud the NIH for proactively addressing the structural racism that permeates the scientific research community. Recognizing the challenges within our own field, in 2019, the PAA established a task force to develop and support opportunities for BIPOC demographers to gather and interact

with senior scholars; provide mentoring opportunities; ensure diversity in PAA's governance and programming; and to incorporate issues of interest into the PAA Annual Meeting. The task force, which has since been formalized within the PAA governance structure as the PAA Diversity, Equity, and Inclusion Committee, has provided an ongoing forum for educating our members and developing initiatives to ensure greater opportunities for population scientists regardless of their race, ethnicity, gender, gender expression, socioeconomic status, nationality, ability, and sexual orientation, and to encourage the adoption of effective institutional policies and practices that encourage and enhance greater diversity in the scientific workforce.

Within our organizational efforts, we have grappled with the lack of data regarding the DEIA environment. We believe the NIH should be collecting and sharing demographic data regarding grantees to facilitate a greater understanding of the DEIA environment. For example, the scientific research community needs better data to determine the percentage of tenured faculty and graduate students that are underrepresented among NIH grantees. Further, there are a dearth of data about existing programs that support underrepresented scholars in training and retention. These data are crucial to informing the adoption of constructive organizational DEIA workforce practices both within the NIH and academic research institutions.

Grow and Sustain DEIA through Structural and Cultural Change

It is imperative that institutions supported by NIH funding provide evidence of a commitment to workforce diversity practices. Unfortunately, the institutions that often receive the most NIH dollars do not have strong commitments to diversity in recruitment, hiring, training, and/or retention. A large body of research shows that efforts to diversify the workforce through mentorship or other programs will not work if there are no institutional practices in place to ensure diversity and accountability to diversity. The NIH Faculty Institutional Recruitment for Sustainable Transformation (FIRST) program is a good model for supporting institutions that also commit their own resources to diversity as well to ensure transformational change institutionally and structurally.

Advance DEIA Through Research.

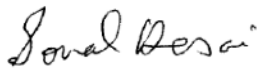
Advancing DEIA through research should begin with the NIH peer review process. We hope the NIH DEIA strategic plan will prioritize DEIA training for NIH review committees as part of their preparations. Moreover, the composition of review committees needs to be critically assessed to reduce systematic bias that occurs when funding decisions are made, and significant questions are considered. Just as we might ensure that an expert of racism is included in a grant that plans to examine racism, we must also ensure that experts in these areas are represented on review panels.

The bulk of NIH funding focuses on biomedical and behavioral research. While this is important and crucial research, this research has to be informed by work on structural racism to ensure that biological and deficit-based definitions and conceptions of race do not continue to be reified. One possibility is to include another criterion in assessments of grants or expanding definitions of impact, significance, innovation, environment, and approach to

ensure structural racism is addressed in terms of who benefits from research and how race is being operationalized and understood.

In sum, our organizations believe the proposed framework addresses important, ambitious objectives. We hope that our comments inform the next steps that the NIH takes to fully develop its DEIA Strategic Plan. Thank you for considering our views. Please do not hesitate to contact us if our organizations can be of further assistance.

Sincerely,



Dr. Sonalde Desai
President
Population Association of America



Dr. Sara R. Curran
President
Association of Population Centers