

November 13, 2020

Suzanne H. Plimpton
Reports Clearance Officer
National Science Foundation
2415 Eisenhower Avenue
Suite W18200
Alexandria, VA 22314

Submitted electronically via email: splimpto@nsf.gov

Dear Ms. Plimpton,

The Federation of American Societies for Experimental Biology (FASEB) appreciates the opportunity to comment on the proposed renewal of the National Science Foundation's (NSF's) [Survey of Earned Doctorates](#) (SED), published in the [Federal Register](#) on October 14. This instrument provides valuable data and insights collected annually on the up-and-coming workforce including demographics, previous education, enrollment in joint degree programs, and postgraduation plans. Metrics collected over time aid in evaluation of changing trends, allowing policies to be data-driven and reflect realities of the next generation of researchers. Information collected in the SED and resulting analysis are essential to supporting NSF's commitment to broadening participation.

However, there are limitations to the data currently collected. To best serve individuals who are society's future leaders and innovators we must collect data to understand their backgrounds and experiences. For example, [sex](#) lists only male and female. Echoing FASEB's previous [comments](#) on the Survey of Graduate Students and Postdoctorates in Science and Engineering, the Federation encourages NSF to evaluate the SED questionnaire with disaggregation of data and intersectional identities at the forefront. This is especially notable for historically excluded groups—particularly those that thus far have a small sample size and represent an important component of a diverse workforce.

FASEB was extremely pleased to learn of NSF's involvement in the Federal Interagency Working Group on Measuring [Sexual Orientation and Gender Identity](#) (SOGI) in response to comments on the Survey of Graduate Students and Postdoctorates in Science and Engineering. Consistent wording for questions of sexual orientation and gender identity across federal agencies will aid greatly in downstream analysis of data from multiple surveys and reduce administrative burden. A measured approach of working towards collecting this critical data while ensuring standardization for reliable data is commendable. Nevertheless, careful methodology must also be balanced with timeliness. Every annual survey deployed ignoring marginalized scholars is invaluable data lost, and as very little data for vulnerable populations exists any increase in quantitative data will prove significant.

NSF has an opportunity to be the leader and standard-bearer in enabling reporting vital disaggregated data that acknowledges multiple intersecting identities. Assessment of expanded information collected will provide key awareness and understanding of the evolving workforce ecosystem. Therefore, FASEB encourages NSF and SOGI to work swiftly towards implementation.

Sincerely,

A handwritten signature in black ink, reading "Louis B. Justement". The signature is fluid and cursive, with a large, sweeping loop at the end.

Louis B. Justement, PhD
FASEB President