

**ASN response to the National Institutes of Health (NIH) Request for Information (RFI) on Recommendations on Re-envisioning U.S. Postdoctoral Research Training and Career Progression within the Biomedical Research Enterprise**

*(\*Please note that response fields are limited to 200 words.)*

**Recommendation 1.3 Part 1: Limit the total number of years a person can be supported by NIH funds in a postdoctoral position to no more than 5 years.**

- Describe any potential benefits, opportunities, challenges and/or consequences to the postdoctoral workforce or the extramural research community if NIH were to limit total years of NIH-supported funding support for postdoctoral scholars.
- Please describe any existing NIH or extramural institutional policies that could pose challenges for the implementation of a policy to limit aggregate NIH funding support for postdoctoral scholars.

*The NIH supports nearly 76% of postdoctoral scholars in U.S. biomedical sciences. However, many postdoctoral scholars are leaving or forgoing fellowships due to low salaries and unequal benefits. Limiting NIH funding for postdocs to five years could open opportunities for new scholars and help transition existing postdocs to advanced career stages. However, challenges may arise as some research, especially long-term interventions, may require more than five years. Limiting funding to five years could hinder progress in fields needing extended research timeframes. The existing K99/R00 grant already limits postdoctoral funding to five years and could serve as a model. However, it is one of the few mechanisms allowing non-U.S. citizens to apply for funding. According to NIH and NSF, 60-65% of postdoctoral fellows in U.S. biomedical research are non-U.S. citizens. Without extending eligibility for all postdoc grants (not just the K99/R00), a five-year funding limit could disadvantage a significant portion of the workforce and limit research progress. Many non-citizens would only be able to apply for essential research grants. A more effective policy might focus on where the research is conducted (in the U.S. or with U.S.-based collaborators) rather than citizenship status.*

**Recommendation 1.3 Part 2: Limit the total number of years a person can be supported by NIH funds in a postdoctoral position to no more than 5 years.**

- Please describe any key NIH or extramural institutional policies, process or resources that should be developed, improved or expanded to address any potential challenges associated with limiting aggregate funding support for postdoctoral scholars.
- What mechanisms should be put into place by extramural institutions to support transitions for postdoctoral scholars nearing the end of the five-year period?

*NIH and extramural institutional policies regarding eligibility for funding based on citizenship status should be expanded to address challenges and ensure equitable access to grants for all of the biomedical postdoctoral workforce. Additionally, current NIH postdoctoral salaries vary across institutes despite similar work expectations. High-cost cities make it difficult for postdoctoral scholars to maintain a reasonable standard of living. For example, the starting NIH postdoctoral salary of \$60,250 is inadequate in areas such as the DC metro area where the living wage for an adult supporting a child is \$89,202. Establishing clear institutional guidelines for NIH support could level the playing field for postdocs in these regions. The Individual Development Plan*

*(IDP) is a valuable tool for postdocs and mentors to discuss career goals and transitions to more advanced stages. However, at many institutions, the IDP is recommended, not required, which limits its impact. Making IDPs mandatory as part of postdoctoral training could enhance career development outcomes. Extramural institutions should also implement programs that assist postdocs in job searching and applications by the fourth year of training. Postdocs needing support in finding positions as Principal Investigators will require help from their institutions, even when seeking positions outside their current organization.*

**Recommendation 2.2 Part 1: Revise the K99/R00 mechanism to focus on ideas and creativity over productivity.**

- Describe any potential short- and long-term benefits and/or challenges to the postdoctoral workforce that may result from limiting the K99/R00 eligibility timeframe to no more than 2 years of postdoctoral experience.

*ASN supports limiting K99/R00 eligibility to 2 years of postdoctoral experience, aiming to help early-career investigators secure research funding sooner and reduce their years of experience before they obtain their first R01. However, this time limit could present challenges for postdocs who have shifted research fields and require more time for training and publications. Additionally, those who face personal challenges, such as parental or disability leave, may also need extra time before applying for the K99/R00. To address these barriers, it would be beneficial to establish clear guidelines that allow for reasonable extensions beyond the 2-year eligibility limit. This flexibility could help ensure equitable access to the K99/R00 for those who encounter such circumstances while maintaining the goal of fostering early career advancement.*

**Recommendation 2.2 Part 2: Revise the K99/R00 mechanism to focus on ideas and creativity over productivity.**

- How should the K99/R00 mechanism and review criteria be revised to better emphasize creative ideas and innovation over research productivity? What specific criteria or metrics should be used to evaluate creativity and potential impact of applicants' research proposals?
- Provide input on key NIH and extramural institutional policies, processes or resources that may need to be developed or revised to ensure that changes to K99/R00 program eligibility do not negatively impact access to these awards to a broader range of postdoctoral scholars.

*The K99/R00 mechanism and review criteria should shift focus from research productivity to creative ideas and innovation. Applicants should be able to showcase their work beyond peer-reviewed publications by including less traditional outlets, such as meeting presentations and other communications, research projects, and research community engagement. Rather than prioritizing the quantity of publications, the review should evaluate creativity, innovation, and potential impact. Key evaluation criteria should include the feasibility of the research project, the support and guidance from the mentoring team, and the project's projected impact on future research programs. To achieve this, the review process should emphasize the originality of the research proposal, the novelty of the scientific approach, and the long-term potential for advancing the field. Clear policies should ensure that applicants from*

*diverse backgrounds, including those with less traditional publication records and from universities across the U.S. and not only institutions that historically receive more grant awards are considered. Revising NIH policies to encourage these broader criteria will help ensure that postdoctoral scholars from various fields and experiences have equitable access to the K99/R00 mechanism.*

**Recommendation 4 Part 1: Promote training and professional development of postdoctoral scholars and their mentors.**

- Provide suggestions/strategies for how NIH and extramural institutions can ensure that career and professional development training becomes an integrated and measured component of the postdoctoral experience.
- What policies and resources should institutions establish to ensure equitable access to career and professional development training for all postdoctoral scholars?
- How can institutions address barriers to participation, such as limited availability of training programs or conflicts with research obligations?

*More training programs and mentoring opportunities are essential for postdoctoral scholars. One strategy to enhance career and professional development is to make the Individual Development Plan (IDP) mandatory for both postdoctoral scholars and mentors, with annual reviews. Postdoctoral scholars should also be encouraged to engage with professional societies in their field, which provide additional support and networking opportunities. To further support mentoring, institutions should incentivize mentors by allowing dedicated time in their work schedules for mentoring responsibilities. This could include training on soft skills such as emotional intelligence, communication, and leadership. A potential incentive could be paid mentorship time and recognition through awards tied to the postdoc's career progression and success. Additionally, implementing 360-degree evaluations, where postdocs evaluate their mentors, could improve the quality of mentorship and accountability. Institutions should also ensure that all postdoctoral scholars have equitable access to training, and they should address barriers like conflicting research obligations by offering flexible program schedules.*

**Recommendation 4 Part 2: Promote training and professional development of postdoctoral scholars and their mentors.**

- What specific skills and competencies are essential for individuals serving in the mentor role for postdoctoral scholars? How should institutions require and support mentor training to ensure the effective mentorship of postdoctoral scholars? Describe any necessary resources required by investigators and institutions to support the implementation of required training opportunities for mentors
- Are there opportunities for collaboration between institutions, funding agencies, and professional organizations to enhance career and professional development opportunities for postdoctoral scholars? How can partnerships with industry, government agencies, and non-profit organizations contribute to the enrichment of postdoctoral training experiences?

*It is essential that mentors dedicate time to meet with and support their mentees. Both mentors and mentees should utilize NIH resources, which offer guidance on developing effective mentoring strategies, setting clear goals, and fostering strong communication.*

*Institutions should require formal mentor training that emphasizes key skills such as leadership, communication, and emotional intelligence. This training should ensure mentors are equipped to guide postdocs in both research and career development. Essential resources include mentor development workshops, peer mentoring programs, and ongoing support from institutional leadership. Collaborative opportunities exist between institutions, funding agencies, and professional organizations to enhance career development for postdocs. Partnerships with industry, government, and nonprofit organizations, including scientific societies, could further enrich postdoctoral experiences by providing additional career pathways and networking opportunities.*