



PUBLIC RESPONSIBILITY IN
MEDICINE AND RESEARCH

Re: Request for Information (RFI): Inviting Comments and Suggestions on a Framework for the NIH-Wide Strategic Plan for Diversity, Equity, Inclusion, and Accessibility (NOT-OD-22-061)

Submitted online at <https://rfi.grants.nih.gov/?s=61e9a09a971100006d005012> on March 11, 2022

Public Responsibility in Medicine and Research (PRIM&R) appreciates the opportunity to comment on the Framework for the NIH-wide Strategic Plan for Diversity, Equity, Inclusion, and Accessibility (DEIA). PRIM&R commends NIH for making such a concerted effort to ensure that this important and complex societal issue is integrated and strengthened across all its activities. However, PRIM&R notes that the published framework is extremely sparse and inadequate in allowing for deliberative feedback from interested stakeholders.

PRIM&R is a nonprofit organization dedicated to advancing the highest ethical standard in the conduct of research. Since 1974, PRIM&R has served as a professional home and trusted thought leader for the research protection community, including members and staff of human research protection programs and institutional review boards (IRBs), investigators, and their institutions. Through educational programming, professional development opportunities, and public policy initiatives, PRIM&R seeks to ensure that all stakeholders in the research enterprise understand the central importance of ethics in the advancement of science.

The RFI seeks input on a proposed framework for the NIH-wide strategic plan for DEIA, which identifies three specific areas or objectives. The paucity of information provided in the RFI, however, makes providing substantive and constructive feedback impossible. For example, the RFI specifically states, “...NIH seeks comments on any or all of, but not limited to, NIH’s priorities across the three key areas (Objectives) articulated in the framework, including potential benefits, drawbacks or challenges, and other priority areas for consideration.” But it is unclear how one would even begin considering “drawbacks” as they relate to, for instance, Objective 2—Grow and Sustain DEIA through Structural and Cultural Change. Furthermore, what drawbacks could ever be associated with “accountability and confidence?” To take another example, with reference to Objective 3—Advance DEIA through Research, it is unclear without more information, what is meant by “Workforce Research” and how that falls within the mission of NIH.

Given the tremendous potential for misinterpretation and misunderstanding of various terms used in the framework, PRIM&R requests that NIH reissue the RFI with additional information that better defines and describes each objective, as well as the sub-components of the objectives. A more developed draft framework will ensure that NIH receives detailed and thoughtful comments from a range of stakeholders on developing a framework to guide its efforts to foster DEIA within the biomedical research enterprise.

Thank you for your consideration and if you have any questions, please feel free to contact me by phone at (617) 423-4112 or e-mail at ehurley@primr.org.