

April 9, 2021

Francis Collins, MD, PhD
Director
National Institutes of Health
One Center Drive
Bethesda, MD 20892

Dear Dr. Collins:

The American Association of Colleges of Osteopathic Medicine (AACOM) appreciates the opportunity to comment on approaches the National Institutes of Health (NIH) can take to advance racial equity, diversity, and inclusion. AACOM looks forward to partnering with the NIH and urges the NIH to collaborate with the osteopathic medical education (OME) community to implement policies to address this important issue.

OME plays a key role in the fabric of our healthcare system and training the future physician workforce. Founded in 1898 to support and assist the nation's osteopathic medical schools, AACOM represents all 37 accredited colleges of osteopathic medicine (COMs). Osteopathic medical schools currently educate nearly 31,000 physicians—25 percent of all US medical students—at 58 teaching locations in 33 US states, as well as osteopathic graduate medical education professionals and trainees at US medical centers, hospitals, clinics and health systems.

AACOM believes that increasing diversity in the physician workforce is vital to meet the nation's healthcare needs. This can be addressed in the recruitment and retention of a diverse student body and by providing training in diverse settings and populations. Collaboration and education among all stakeholders within the health care system, including educational institutions, patients, governing bodies, health care professionals, and organizations, is a key to strengthening inclusion in biomedical research and advancing health disparities and health equity research. Please find our feedback on the request for information outlined below.

AACOM Initiatives

AACOM strives to create and maintain a climate that recognizes differences and commonalities, while understanding and engaging in intentional experiences that nurture acceptance of diverse ideological viewpoints, socio-economic status, racial/ethnic makeup, religious beliefs, and sexual orientation. We are committed to educating and training more osteopathic physicians who embody the fabric of our nation, not only to address disparities in healthcare, but also to improve the overall health of all people. AACOM is committed to increase faculty and staff awareness and understanding of issues of diversity and inclusion through professional development programs.

AACOM's [Council on Diversity and Equity \(CDE\)](#) leads and advocates for best practices in academic medicine that advances diversity and inclusion at AACOM member institutions with the ultimate goal of training osteopathic physicians to provide high quality healthcare for all

communities. The National Research Mentoring Network (NRMN) recently released an [online self-directed course on unconscious bias](#), available to all students, educators and practitioners involved in healthcare. The development of the course involved a collaboration between members of the CDE. The team also created a toolkit, which provides those who complete the modules with tangible tips for how to mitigate their own biases. From the onset, the final product was designed to be available to individuals across the full healthcare continuum, from medical students to attending physicians.

AACOM's ["Finding a Cure: An Open Discussion on Racism and Injustice in the American Healthcare System."](#) event included five panel segments on racism and injustice and the impact to the learner, the healer, medical education, societal health and mental health and well-being. The event is available as a resource to AACOM member institutions, the OME community and beyond. Furthermore, the mission of AACOM's Adaptive Workgroup to Address Racism and Injustice in Healthcare Education is to help ensure osteopathic medical colleges produce physicians that reflect excellence in the inclusive fabric of our diverse nation and assume excellence in healthcare delivery and the elimination of minority health disparities.

AACOM proposes the NIH utilize "Finding a Cure" and the work of AACOM's adaptive workgroup as a resource to launch an expansive media campaign on NIH research opportunities targeted at URM medical students. We specifically encourage NIH to partner with osteopathic leaders who are at the forefront of these issues such as Barbara Ross Lee, DO, the first female African American to be appointed dean of a US medical college, and Marcine Pickron-Davis, PhD, Chief Diversity and Community Relations Officer at the Philadelphia College of Osteopathic Medicine. We recommend these osteopathic leaders appear in the proposed media campaign and act as ambassadors to increasing the perception and reputation of NIH among URM students. To accompany the media campaign AACOM proposes a series of listening sessions across the country, and we would be honored to partner with our member institutions to host.

In addition to improving the learning environment for all students by promoting diversity on all our campuses, we have engaged in several targeted efforts to acquaint those underrepresented in medicine with OME as an accessible alternative to allopathic medical education. These initiatives include the [Diversity in Osteopathic Medicine Virtual Event](#), a fee waiver program to encourage financially disadvantaged students to become osteopathic physicians and the addition of gender identity to the AACOMAS application.

In 2020, AACOM began pilot testing a program, with a commercial partner, Vettd.ai, that incorporates the use of artificial intelligence (AI) to analyze and contextualize each applicant's personal statement and experiences so that our COMs who wish to do a more holistic review of applicants can reduce dependence on MCAT scores and GPAs. Early beta tests of the AI in predicting whether an applicant should be screened for an interview concluded that the AI selected a pool of potential interview candidates that was less white and less male than the pool selected by human application reviewers. In one initial test, AI recommendations of applicants for interviews increased the pool of candidates recommended for an interview by 4 percent, and the increase consisted entirely of candidates from groups under-represented in medicine. This AI

pilot is being tested in COM admissions programs in 14 COM admissions offices to see the large-scale impacts of such a program.

Opportunities to Increase Diversity Research and Impact

OME also has a proven history of establishing educational programs for medical students and residents that target the healthcare needs of rural and underserved populations. In fact, [40 percent](#) of graduating 2019-2020 osteopathic medical students plan to practice in a medically underserved or health shortage area; of those, 45 percent plan to practice in a rural community. With health disparities on the rise, and worsening because of the COVID-19 pandemic, we are proud to help make healthcare access more equitable for all of our country's patients and communities.

As research indicates that medical students who train in community-based institutions are more likely to practice in these areas, AACOM recommends that the NIH support research opportunities for and partner with community-based institutions and osteopathic medical schools in rural locations. These rural training experiences are especially important as our nation faces a growing physician workforce shortage, particularly in rural communities often subject to increased health care challenges and social risk factors. Additionally, AACOM strongly recommends that the NIH increase its enhancement efforts and partnerships with COMs located in Institutional Development Award states, as this funding stream would be beneficial to enabling COMs access to research infrastructure funding as they work to build their research capacities.

AACOM encourages the NIH to continue to fund programs, such as the NRMN, which aims to address the lack of diversity in the biomedical research workforce. We specifically urge the NIH to support training programs for osteopathic medical students from a URM background to provide exposure to NIH research and applying for NIH funding. Relatedly, NIH should invest in the Extramural Loan Repayment Programs, designed to recruit and retain highly qualified health professionals into biomedical or biobehavioral research careers by helping alleviate some of the debt burden that drives many health professionals away from research activities.

COMs are leading the effort to increase diversity in the physician workforce, and as an example, AACOM highlights the [Cleveland Clinic Physician Diversity Scholars Program](#), a partnership with the Ohio University Heritage College of Osteopathic Medicine (OUHCOM). The Physician Diversity Scholars Program takes a proactive approach to building diversity by giving first-year URM students a unique opportunity for growth and engagement. Those selected to participate in the four-year program are matched with a Cleveland Clinic health system physician with whom they will have an opportunity to develop a mentor/ scholar relationship. The program is designed to complement each scholar's curriculum at OUHCOM while offering purposeful and meaningful interaction with underrepresented minority community populations in a healthcare context. As the medical students progress through the program, a portion of their training will be provided at Cleveland Clinic hospitals and family health centers. The Physician Diversity Scholars program is open to all underrepresented minority medical students at OUHCOM, Cleveland. URM for OUHCOM is defined as Black/African-American, Hispanic/Latino, Native American/Alaskan Native, and Pacific Islander/Native Hawaiian. We strongly recommend that

the NIH review this program for opportunities to replicate nationally and collaborate with OUHCOM to expand and incorporate a research focus.

Again, we look forward to working together to improve healthcare for all patients nationwide. If you have any questions or require further information, please contact David Bergman, JD, Vice President of Government Relations, at dbergman@aacom.org.

Sincerely,

A handwritten signature in black ink that reads "Robert A. Cain, DO". The signature is written in a cursive, slightly slanted style.

Robert A. Cain, DO, FACOI, FAODME
President and CEO