



March 10, 2023

Michael Lauer, MD
Deputy Director for Extramural Research
National Institutes of Health
9000 Rockville Pike
Bethesda, MD 20892

Re: Request for Information (RFI) on Proposed Revised Simplified Review Framework for NIH Research Project Grant Applications

Via Electronic Email – <https://rfi.grants.nih.gov/?s=638509b5409baa49f803e572>)

Dear Dr. Lauer:

On behalf of the American Association of Colleges of Osteopathic Medicine (AACOM), we thank you for the opportunity to provide comment and feedback on the Proposed Revised Simplified Review Framework for the National Institutes of Health (NIH) research project grant (RPG) applications. AACOM supports the simplified review framework and strongly encourages NIH to take additional steps to mitigate institutional and individual bias in the grant review process.

Osteopathic medicine plays a critical role in our nation's healthcare delivery system. Founded in 1898 to support and assist the nation's osteopathic medical schools, AACOM represents 38 accredited colleges of osteopathic medicine around the country—educating more than 35,000 future physicians, 25 percent of all U.S. medical students—at 62 teaching locations in 35 states, as well as osteopathic graduate medical education professionals and trainees at U.S. medical centers, hospitals, clinics and health systems.

AACOM has long been concerned with the current review process that has led to serious underfunding of colleges of osteopathic medicine (COMs) by the NIH. According to the U.S. Bureau of Health Professions, osteopathic medicine is the fastest growing medical field in the country, representing a quarter of all medical students, yet COMs receive only 0.1 percent of NIH grant funding compared to 40 percent for allopathic schools. Furthermore, there are no doctors of osteopathic medicine (DOs) among the 3,233 study section reviewers (compared to 493 MDs) and only two DOs among the 462 NIH National Advisory Council members (compared to 213 MDs). This disparity in funding for COMs frustrates osteopathic medical research and puts our medical students at a disadvantage for residency placement because they lack access to research opportunities.

Through the osteopathic community's stakeholder engagement, Congress, in the Consolidated Appropriations 2022 (P.L. 117-103) and 2023 (P.L. 117-328) Acts, acknowledged the benefits of

osteopathic research and directed NIH to report on the status of NIH funding for COMs. Additionally, a bicameral group of 23 lawmakers led by Senator Martin Heinrich (D-NM), Senator Roger Wicker (R-MS) and Representative Susie Lee (D-NV) submitted a letter in July 2022 urging Acting NIH Director Dr. Lawrence A. Tabak to implement a plan to expand funding opportunities for research in osteopathic medicine by:

- Establishing a structured partnership with the osteopathic medical education community, including AACOM, that creates and executes a plan to increase NIH funding for COMs
- Increasing representation for the osteopathic profession on NIH National Advisory Councils and among study selection reviewers
- Creating a program to incentivize principal investigators from COMs
- Considering opportunities to fund research projects that incorporate the osteopathic philosophy and OMT

Unfortunately, the NIH response in August 2022 did not address any of the four congressional recommendations and curiously asserted that DOs "straddle the complementary, integrative health, and allopathic medical communities and have historically been connected to the National Center for Complementary and Integrative Health (NCCIH)." Rather, less than two percent of NIH funding at COMs is administered by the NCCIH and the National Institute on Aging and National Cancer Institute lead in COM funding.

AACOM supports the changes to the framework for evaluating and scoring peer review criteria for NIH RPG applications. Reducing instances of institutional and individual bias are needed improvements to a system that prioritizes established institutions. The revised framework will help ensure that osteopathic researchers can compete for NIH funding but it is not a substitute for NIH establishing a structured partnership with the osteopathic community that creates and executes a plan to increase COM funding and representation.

Thank you for providing the opportunity to share our views and recommendations. We stand ready to serve as a resource for NIH and provide additional information and consultation as this process moves forward. If you have any questions or require further information, please contact me at dbergman@aacom.org.

Respectfully,



David Bergman, JD
Vice President of Government Relations