



October 27, 2023

Ranking Member Bill Cassidy, M.D.
Committee on Health, Education, Labor, and Pensions
U.S. Senate
428 Senate Dirksen Office Building
Washington, D.C. 20510

Re: Request for Information Regarding Modernizing the National Institutes of Health

Submitted via email: NIHModernization@help.senate.gov

Dear Dr. Cassidy,

On behalf of the American Association of Colleges of Osteopathic Medicine (AACOM), thank you for issuing a Request for Information (RFI) about proposals to modernize the National Institutes of Health (NIH) and enhance public trust. AACOM finds there are gaps in research funding for and representation from the osteopathic medical community that need to be addressed to strengthen the NIH and ensure it achieves its mission to advance medicine and science through clinical research.

Physicians and researchers trained at our nation's colleges of osteopathic medicine (COMs) have much to contribute to medical and scientific research and stand ready to work with you and your congressional colleagues to advance policies that will modernize NIH and enhance public trust.

About AACOM and Osteopathic Medicine

AACOM leads and advocates for osteopathic medical education to improve the health of the public. Founded in 1898 by the nation's osteopathic medical schools, AACOM represents all 41 colleges of osteopathic medicine — educating more than 35,000 future physicians, 25 percent of all U.S. medical students — at 66 medical school campuses, as well as osteopathic graduate medical education professionals and trainees at U.S. medical centers, hospitals, clinics, and health systems.

Osteopathic medicine is at the forefront of healthcare delivery, encompassing all aspects of modern medicine and therapeutic innovation. Osteopathic medicine also confers the added benefit of hands-on diagnosis and treatment of conditions through a system known as osteopathic manipulative medicine. Doctors of Osteopathic Medicine (DOs) are trained in medical school to take a holistic approach when treating patients, focusing on the integrated nature of the various organ systems and the body's incredible capacity for self-healing. DOs are licensed in all 50 states to practice medicine, perform surgery and prescribe medications. The osteopathic medical tradition holds that a strong foundation as a generalist makes one a better physician, regardless of one's ultimate practice

specialty—which is the reason why more than half of DOs currently practice in primary care.¹ More than 7,800 DOs were added to the U.S. physician workforce in 2023, joining the 141,000 DOs already in practice.²

Barriers to Osteopathic Research and Representation at NIH

Osteopathic researchers are committed to furthering clinical research that can be used to enhance life and reduce illness and disability. However, these researchers face challenges that limit their ability to fully contribute to the NIH scientific community. These barriers stifle clinical research, especially in fields such as primary care, non-prescription treatments for pain management, chronic disease and elderly care, and treatment of rural and underserved populations.

Although colleges of osteopathic medicine comprise one quarter of all medical schools, they are severely underrepresented on NIH scientific review groups and advisory councils compared to allopathic researchers. **There is not a single DO among the 3,233 grant reviewing study section members, compared to 493 MDs.** Similarly, **DOs hold only 2 out of the 462 positions on NIH National Advisory Councils, whereas MDs account for 213 spots.** In fact, DOs have lower than 1 percent representation in critical positions within NIH despite representing twenty-five percent of all medical students.

This underrepresentation results in a substantial gap in access to research funding. Currently, **COMs receive only 0.1 percent (\$60.2 million) of all NIH grant funding.**³ On the other hand, allopathic medical schools receive 42 percent (\$25.11 billion) of the NIH's \$59.27 billion research budget.⁴ 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.

While osteopathic medical schools have the expertise, infrastructure and processes in place to manage NIH funding, outdated NIH policies and procedures fail to take advantage of what the profession has to offer. These system failures and biases discourage osteopathic researchers from applying for and receiving NIH grants resulting in critical clinical areas being underexplored.

Congress has acted to address this discrepancy, but the NIH has largely ignored their direction:

- The Joint Explanatory Statement of the Consolidated Appropriations Acts of 2022 (P.L. 117-103) acknowledged the benefits of osteopathic research and directed NIH to report on the status of NIH funding for COMs.
- A bipartisan, bicameral group of 26 lawmakers led by Senator Martin Heinrich (D-NM), Senator Roger Wicker (R-MS) and Representative Susie Lee (D-NV) submitted a [letter to NIH](#) in

¹ American Osteopathic Association, OMP Report, available at <https://osteopathic.org/about/aoa-statistics/>

² American Osteopathic Association, OMP Report, available at <https://osteopathic.org/about/aoa-statistics/>

³ NIH Reporter, available at <https://reporter.nih.gov/search/gVVlo6UHiEa0GkXng7-ldg/projects>

⁴ NIH Reporter, available at https://reporter.nih.gov/search/29_xshqmRU2RdZfREbhLnA/projects

July 2022 urging then-Acting NIH Director Dr. Lawrence A. Tabak to implement a plan to expand funding opportunities for research in osteopathic medicine.

- The FY23 House Labor, Health & Human Services, Education, and Related Agencies (LHHSE) appropriations bill (H.R. 8295) included report language noting the importance of osteopathic research funding in the FY23 omnibus appropriations bill and requesting an update on the "current status of NIH funding to colleges of osteopathic medicine and representation of doctors of osteopathic medicine on NIH National Advisory Councils and standing study sections in the fiscal year 2024 Congressional Justification."
- The FY24 Senate LHHSE appropriations bill (S. 2624) included report language urging "NIH to consider how best to incorporate colleges of osteopathic medicine into research activities and involvement of their researchers on NIH National Advisory Councils and study sections to have better representation of the osteopathic medicine field."

Unfortunately, **the NIH letter of response to Congress 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)." This response showed ignorance of the profession as less than two percent of NIH funding to COMs is administered by the NCCIH while the National Institute on Aging and National Heart, Lung, and Blood Institute lead in COM funding. On May 11, 2023, AACOM representatives met with NIH leaders to discuss the issue, but NIH was unwilling to work with the osteopathic community to create any new programs or processes for increasing osteopathic representation or research. Ultimately, NIH fails to acknowledge there is a problem and refuses to respond to repeated congressional requests for improvement.

AACOM Policy Recommendations

Osteopathic medicine has a blueprint for improving patient outcomes that relies on research-backed practices for continuous improvement. The osteopathic research community is willing and able to contribute to the modernization of the NIH through more osteopathic representation and research. We respectfully offer the following recommendations to achieve this goal:

1. **Establish a structured partnership between the NIH and the osteopathic medical education community, including the American Association of Colleges of Osteopathic Medicine (AACOM), which creates and executes a plan to increase NIH funding for COMs.**
2. **Establish an NIH program to incentivize principal investigators from COMs.**
3. **Consider opportunities to fund NIH research projects that incorporate the osteopathic philosophy and osteopathic manipulative treatment (OMT).**
4. **Increase representation for the osteopathic profession on NIH National Advisory Councils and study selection reviewers.**

To advance medicine and science through clinical research and strengthen public trust in the NIH mission, we must ensure all qualified researchers are contributing to its body of work. Making these

investments now will pay dividends for decades to come. Engaging osteopathic medicine will lead to a more robust scientific community, and with it, improved clinical outcomes.

Conclusion

On behalf of our nation's osteopathic medical schools, their medical students and researchers, and the patients they serve, thank you for your consideration of our views and recommendations. We are eager to be a resource as you develop strategies for strengthening and modernizing the NIH. Please contact me at dbergman@acom.org if AACOM can provide further clarification or information.

Sincerely,



David Bergman, JD
Senior Vice President of Government Relations and Health Affairs
AACOM