

August 7, 2020
Nora D. Volkow, MD
Director
National Institute on Drug Abuse
National Institutes of Health
ATTN: NIDA Strategic Planning Team
6001 Executive Boulevard
Rockville, MD 20852

Via electronic submission at NIDAStrategicPlan@nida.nih.gov

Re: Request for Information: Inviting Input on NIDA's Strategic Plan for Fiscal Years 2021 – 2025

Dear Director Volkow and the NIDA Strategic Planning Team:

The American Association of Colleges of Osteopathic Medicine (AACOM) appreciates the opportunity to submit comments to the National Institute on Drug Abuse (NIDA) on its request for information (RFI) on the outline for the NIDA Strategic Plan for fiscal years 2021 – 2025. AACOM leads and advocates for the full continuum of osteopathic medical education (OME) to improve the health of the public. Founded in 1898 to support and assist the nation's osteopathic medical schools, AACOM represents all 37 accredited colleges of osteopathic medicine (COMs)—educating nearly 31,000 future physicians, 25 percent of all U.S. medical students—at 58 teaching locations in 33 U.S. states, as well as osteopathic graduate medical education professionals and trainees at U.S. medical centers, hospitals, clinics, and health systems.

Collaboration and education among all stakeholders within the health care system, including educational institutions, patients, governing bodies, health care professionals, and organizations, must continue in order to help address appropriate pain treatment and substance abuse, and advance addiction science. Please find our feedback on the RFI outlined below.

Cross-Cutting Themes and Scientific Stewardship of Public Resources

AACOM stands ready to collaborate with NIDA to raise awareness and engage the medical community in drug abuse and addiction prevention and treatment, use evidence-based strategies to integrate screening and treatment for opioid use disorders in primary care settings, and address the opioid crisis in rural regions. Osteopathic medicine is one of the fastest growing health care professions in the country and plays a vital role in treating our nation's rural and underserved populations. *As such, AACOM encourages NIDA to enhance research opportunities for osteopathic medical schools to address these disparities by supporting programs that assist osteopathic institutions with building research capacities and infrastructure. We strongly recommend that NIDA collaborate with the OME community through increased opportunities for osteopathic representation on NIDA's federal committees, commissions, councils, advisory*

and scientific peer review panels, and task forces.

OME plays a key role in training the future physician workforce. Many current osteopathic medical students will pursue careers in primary care, and many of these students will practice in rural and urban medically underserved areas where addiction treatment is needed. According to the results of the 2020 National Resident Matching Program, 44% of the total osteopathic seniors who submitted a rank order list matched to the primary care specialties excluding OB/GYN.

As research indicates that medical students who train in community-based institutions are more likely to practice in these areas, AACOM also recommends that NIDA support research opportunities for and partner with community-based institutions. COMs have a standing commitment to and focus on training primary care physicians, which mirrors the special commitment osteopathic physicians have to providing primary care, particularly to the nation's rural and underserved populations. Osteopathic medical school accreditation requirements mandate that each school provide medical care to the community where its students train, many of which are rural. 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 certain social risk factors, including the opioid crisis.

AACOM urges NIDA to partner with the OME community as it works to understand interactions between substance use, HIV, and other co-occurring conditions, including COVID-19. We support NIDA in its efforts to model the complexity of drug use and related behaviors and recommend that NIDA seek continuous input from the COMs and broader OME community. Specifically, osteopathic medical schools and the OME community are uniquely positioned to play a prominent role in efforts to tackle the opioid epidemic, particularly in the country's rural and underserved communities, where the effects of this crisis are often greatest.

According to AACOM's most recent Annual Survey of the COMs:

- 37 of 39 of the COMs have required education addressing pain management;
- 38 of 39 of the COMs have required education addressing the treatment of substance use disorders (SUDs); and
- 37 of 39 of the COMs teach pain management and assessment using non-pharmacological modalities, specifically osteopathic manipulative medicine (OMM).

The nation's osteopathic medical schools have consistently demonstrated their commitment to addressing the opioid epidemic. For example, an overwhelming majority of the COMs joined with other medical schools to answer a call for action by the White House Office of National Drug Control Policy and pledged, beginning in the fall of 2016, to require all students to take a form of prescriber education in line with the Centers for Disease Control and Prevention's Guideline for Prescribing Opioids for Chronic Pain. In a short time, the COMs have established a variety of unique approaches and partnered with other stakeholders and governing bodies to provide this important level of education.

In addition, AACOM encourages NIDA to support initiatives that facilitate communication among patients and health professionals to help ensure culturally competent care. Because economically depressed populations often lack reliable and regular access to Internet sources, a focus solely on electronic or Internet messaging may not be adequate in reaching these at-risk populations. AACOM supports NIDA in its effort to leverage technology and innovation while capitalizing on big data analytics and open data sharing. ***AACOM also agrees that effective communication and dissemination of NIDA’s research is vital to advancing its goals and strategic actions. We encourage NIDA to actively strive to communicate its goals and research findings in a comprehensive manner to provider and consumer organizations in order to maintain stakeholder engagement throughout NIDA’s planning process and implementation.***

Further, AACOM strongly supports strategies to hire and retain a diverse and high caliber workforce to support and achieve the NIDA mission. We stress the importance of working collaboratively across the federal government to document and implement best practices related to administrative and operational functions as well as employee engagement, performance, and accountability.

NIDA’s Priorities and Goals Across the Three Objectives

AACOM recommends that NIDA support evidence-based research for integrative health approaches and recognize the important role that osteopathic manipulative treatment (OMT) or OMM can play in addressing medical and musculoskeletal conditions. AACOM continues to support pain education at pre-and post-graduate levels for all practitioners whose patient populations face pain-related conditions. Medical students training to become osteopathic physicians receive extra training in the musculoskeletal system and learn the value of OMT as a non-pharmacological alternative to pain management. When appropriate, OMT can complement, or even replace, drugs or surgery. In this way, OMT brings an important dimension to standard medical care. Importantly, because of OME’s distinctive training in OMM, its focus on the whole person, the number of graduates training and practicing in areas hard-hit by the opioid crisis, and the high proportion of osteopathic physicians practicing in primary care and other fields that are on the “front lines” of treating pain and caring for those with SUDs, OME is poised to make a difference in treating these patients.

AACOM encourages NIDA to partner with the osteopathic community as it seeks to develop treatments for addiction and other chronic medical conditions. AACOM believes it is imperative that NIDA prioritize programs and initiatives that help to enable patients to get the most from new discoveries in basic and clinical research by improving health care delivery. Further, AACOM recognizes that loan repayment programs help to recruit and retain highly qualified health professionals into biomedical or biobehavioral research careers.

AACOM recognizes the dire situation of the opioid crisis and has established an Opioid Advisory Task Force.

The task force provides support to the OME community by:

- Serving as an expert resource for AACOM to evaluate legislative and regulatory policies;

- Providing guidance on research priorities and responding to data collection efforts and other inquiries about ways in which OME can or is making a difference in treating pain and caring for those with SUDs;
- Developing or guiding the advancement of curricular resources to support addressing patients' pain, safely prescribing opioid medications, and treating SUDs; and
- Sharing best practices among AACOM membership.

Task force members recommend that NIDA work to attain data on the attitude of the learner, as well as any behavioral change to ensure that physicians who get addiction training incorporate what they have learned into their practice. Further, it has been noted that a major key to reducing drug abuse is to provide proper educational materials to parents, in an effort to foster healthy family structures where children and adolescents feel respect for their opinions and are taught clear boundaries between proper and improper behaviors. Members have also noted that NIDA should place particular importance and emphasis on:

- *Goal 1: Understand Drug Use, Behavior, and the Brain, Action 1.3: Determine individual and population level risk and protective factors for drug use and addiction across the lifespan;*
- *Goal 2: Develop and Test Novel Prevention, Treatment, and Recovery Support Strategies, Action 2.2: Target interventions to the needs of the whole patient and their families*
- *Goal 3: Implement Evidence-Based Strategies in Real-World Settings, Action 3.1: Support research to scale up application of tested interventions that include screening, harm reduction approaches, and collaborative care models.*

Future Opportunities and Emerging Needs

As NIDA plans for the future, it is critical to consider the prevailing impact COVID-19 will have on research, patient care, health delivery, and workforce needs. With COVID-19 disproportionately impacting racial and ethnic minorities, programs aimed at mitigating health disparities across racial and ethnic groups and recruiting and training a culturally competent health care workforce have become even more vital. Investing in and collaborating with our health care workforce is paramount in addressing public health crises by testing new models of care and training future providers.

Finally, NIDA should consider providing increased support for training opportunities that seek to enhance collaboration between osteopathic and allopathic institutions and other health professions institutions, since interprofessional team-based care is a major consideration in the future of quality patient care. As an inaugural partner of the Interprofessional Education Collaborative (IPEC), which was formed to promote and encourage constituent efforts to advance interprofessional learning experiences to help prepare future health professionals for enhanced team-based care of patients and improved population health outcomes, AACOM has worked with IPEC members to develop a widely accepted set of competencies in interprofessional education. We encourage NIDA to utilize these IPEC resources as the strategic plan is developed.

Thank you for the opportunity to share our views. AACOM looks forward to partnering with NIDA as it continues to implement policies and programs to combat drug use and addiction and strengthen a health care system that enables current osteopathic medical students and future osteopathic physicians to provide the necessary care to meet the needs of our nation's diverse patient populations. If you have any questions or require further information, please contact Judith Mun, Director of Government Relations, at (202) 844-4221 or jmun@acom.org, or Julie Crockett, Associate Director of Government Relations, at (202) 844- 4231 or jcrockett@acom.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