AACOM Comments on the National Institutes of Health (NIH) Request for Information (RFI)

Framework for NIH-Wide Strategic Plan for FYs 2021 – 2025
Comments submitted on April 1, 2020

1. Cross-Cutting Themes articulated in the framework, and/or additional cross-cutting themes that may be considered.

AACOM stands ready to collaborate with the NIH on the implementation of language provided in the fiscal year 2020 appropriations law, which recognizes the importance of enhancing NIH research funding for osteopathic medical schools, as 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, underserved, and socioeconomically challenged populations. In this effort, AACOM encourages the NIH to develop specific programs to address disparities based on professional credentials.

AACOM believes that increasing diversity in the physician workforce is important to meet health care needs. This can be addressed in the recruitment and retention of a diverse student body and by providing training in diverse settings, such as in rural areas, and to diverse populations, such as veterans and the underserved. Osteopathic medical education (OME) plays a key role in training the future physician workforce. Currently, nearly 31,000 future physicians, approximately 25 percent of all U.S. medical students, are enrolled at the nation’s 36 osteopathic medical schools – at 57 teaching locations in 33 U.S. states. 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; these are areas that already face shortages of primary care providers. According to AACOM’s most recent data, 32 percent of graduates indicated their intent to specialize in the primary care specialties of family practice, general internal medicine, or general pediatrics.

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. Colleges of osteopathic medicine (COMs) have a standing commitment to and focus on training primary care physicians, which mirrors the special commitment osteopathic physicians have in providing primary care, particularly to the nation’s rural and underserved populations. Also, accreditation requirements for osteopathic medical schools mandate that each school provide medical care to the community where its students train, and the current OME model links the osteopathic medical schools’ training to the communities where they teach students, especially important as our nation faces a
The AACOM Council of Osteopathic Researchers supports and coordinates medical education research efforts, focusing on teaching/learning issues as well as institutional research at osteopathic medical schools. AACOM has established the Undergraduate Medical Education – Graduate Medical Education Digital Resource Library to serve the osteopathic medical education community and beyond and provide information about osteopathic training, Osteopathic Recognition, accreditation, evaluations, and many more topics. The library also offers information on upcoming osteopathic courses, lectures, and events, often available for continuing medical education credits.

2. **NIH's priorities across the three Objectives articulated in the framework, including potential benefits, drawbacks or challenges, and other priority areas for consideration.**

AACOM recommends that the NIH support evidence-based research for integrative health approaches and recognize the important role that osteopathic manipulative treatment (OMT) or osteopathic manipulative medicine (OMM) can play in serving as a critical approach to 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 osteopathic manipulative treatment (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 osteopathic medical education’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 substance use disorders (SUDs), osteopathic medical education is poised to make a difference in treating these patients. AACOM encourages the NIH 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 NIH 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. AACOM urges the NIH to continue to support 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. Similarly, the Lasker Clinical...
Research Scholars Program is especially important to independent clinical researchers early in their careers, as it offers a unique bridge between the NIH intramural and extramural research communities. In addition, AACOM encourages the NIH to maximize funding available through the Small Research Grant Program as it works to encourage small-scale research projects and enables researchers to test pilot and feasibility studies, which can lead to more advanced and in-depth research in the future.

Additionally, AACOM strongly recommends that the NIH increase its enhancement efforts and partnerships with COMs located in Institutional Development Award (IDeA) 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 strongly supports strategies to hire and retain a diverse and high caliber workforce to support and achieve the NIH mission. We also 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.

3. Future opportunities or emerging trans-NIH needs.

AACOM recommends that the NIH strive to streamline communication and coordinate across its institutes between prospective grantees. AACOM encourages the NIH to bolster its resources for applicants and appoint additional staff across NIH who provide on-the-ground support to assist OME partners throughout the process to complete the necessary administrative and documentation requirements.

The NIH 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 the NIH to utilize these IPEC resources as the strategic plan is developed.

AACOM looks forward to partnering with the NIH as it continues to implement policies and programs to strengthen academic partnerships to build 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 veterans and beyond.

To view the RFI, please visit: https://grants.nih.gov/grants/guide/notice-files/NOT-OD-20-064.html