



**Association of
American Medical Colleges**
655 K Street, N.W., Suite 100, Washington, D.C. 20001-2399
T 202 828 0400 F 202 828 1125
www.aamc.org

September 1, 2023

Office of the Assistant Secretary for Planning and Evaluation
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Re: Request for Comments on the Draft HHS Scientific Integrity Policy (88 FR 46802)

Submitted electronically at scientificintegrity@hhs.gov.

The Association of American Medical Colleges (AAMC) appreciates the opportunity to provide feedback to the Dept. of Health and Human Services (HHS) on the agency's draft scientific integrity policy.

The AAMC is a nonprofit association dedicated to improving the health of people everywhere through medical education, health care, medical research, and community collaborations. Its members are all 157 U.S. medical schools accredited by the Liaison Committee on Medical Education; 13 accredited Canadian medical schools; approximately 400 teaching hospitals and health systems, including Department of Veterans Affairs medical centers; and more than 70 academic societies. Through these institutions and organizations, the AAMC leads and serves America's medical schools and teaching hospitals and the millions of individuals across academic medicine, including more than 193,000 full-time faculty members, 96,000 medical students, 153,000 resident physicians, and 60,000 graduate students and postdoctoral researchers in the biomedical sciences. Following a 2022 merger, the Alliance of Academic Health Centers and the Alliance of Academic Health Centers International broadened the AAMC's U.S. membership and expanded its reach to international academic health centers.

The AAMC strongly supports the effort led by the White House Office of Science and Technology Policy (OSTP) to strengthen, institutionalize, and implement scientific integrity policies across the federal government and the release of a framework¹ to inform the development of these policies and

¹ A Framework for Federal Scientific Integrity Policy and Practice. Guidance by the Scientific Integrity Framework Interagency Working Group of the National Science and Technology Council. January 2023.
<https://www.whitehouse.gov/wp-content/uploads/2023/01/01-2023-Framework-for-Federal-Scientific-Integrity-Policy-and-Practice.pdf>

practices at the agency level. As AAMC previously noted in joint comments² to inform OSTP's work, "Protecting the integrity of science and ensuring the use of evidence in policymaking should be a national priority across administrations."

The AAMC appreciates HHS' engagement of the scientific community as it develops a scientific integrity policy based on the OSTP framework. As stated in the draft, we strongly agree that "the success of HHS's mission to enhance the health and well-being of all Americans depends on the development and use of accurate, complete, and timely scientific and technical information."

The importance of a formalized scientific integrity policy for HHS comes at a critical juncture. Public trust in science, and relatedly, the use of scientific evidence to inform public health recommendations, has been shaken by anti-science rhetoric, a lack of transparency, and questions about the validity of science conducted and supported by the federal government. Nowhere was this more evident than in the challenges experienced during the COVID-19 pandemic, which was marked by periods of vaccine hesitancy and a troubling amount of misinformation regarding viruses and immunity. As we have seen, public attitudes toward science impact not only the federal government, but the whole of the scientific community and enterprise, and our ability to effectively respond to ever greater health threats.

Overall, we are very encouraged by the draft policy that has been proposed by HHS and the detailed requirements that the agency has set forth. We are strongly in agreement that preserving scientific integrity across the federal government will be dependent on strong policies which are frequently reviewed, updated as needed, and closely monitored for effectiveness as well as compliance. In particular, we appreciate that the agency has specifically identified the roles and responsibilities of individuals across the agency and called out the importance of diversity, equity, inclusion and accessibility and its contribution to a culture of scientific integrity.

We are pleased to provide here a few additional specific comments on the draft HHS scientific integrity policy.

- **Effective Date and Policy Amendments:** We recommend that the policy specify that review will take place at minimum every 2 years as recommended in the OSTP model policy, rather than "regularly."
- **Promoting a Culture of Scientific Integrity:** The draft as currently written does not prescribe any requirements or timelines for training HHS employees on their responsibilities under this policy. We recommend that the agency amend existing processes for new employees to incorporate basic knowledge and information about this policy. For HHS advisory committee members appointed specifically to review and communicate on science and scientific activities, training on this policy should be a mandatory part of onboarding.

² AAAS, AAMC, AAU, APLU, and COGR Letter to the White House Office of Science and Technology Policy re: Request for Information to Improve Federal Scientific Integrity Policies (86 FR 34064). July 27, 2021. <https://www.aamc.org/media/55711/download?attachment>.

- **Monitoring and Evaluating Scientific Integrity Activities and Outcomes:** We would like to reiterate our comments² on the importance of evaluation as HHS undertakes the policy development process: “Strengthening policies on scientific integrity is a good start, but ensuring that these policies are adhered to, and evaluating outcomes from their implementation, should be a key part of the process to improve scientific integrity.” We strongly encourage the agency to amend this draft so that the final policy includes the suggested metrics to collect and report as specified by OSTP, to increase transparency and provide assurance that the scientific integrity policy is achieving the intended outcomes.

Finally, while we strongly support the public posting of the scientific integrity policy and related annual reports on the HHS website, we urge the agency to consider additional ways to engage with the public, including the broader scientific community. These methods could include townhalls, opportunities to comment on policy revisions and updates, and a mechanism to contact the agency Scientific Integrity Official, to ensure accountability and foster a culture of trust.

We are very appreciative of the work HHS has undertaken to formalize a scientific integrity policy, and to closely follow the provisions in the ideal policy proposed by OSTP. The AAMC looks forward to continued engagement with HHS as the policy is finalized and implemented. Please feel free to contact me or my colleagues Anurupa Dev, PhD, Director of Science Policy and Strategy (adev@aamc.org) and Heather Pierce, JD, MPH, Senior Director for Science Policy and Regulatory Counsel (hpierce@aamc.org) with any questions about these comments.

Sincerely,

A handwritten signature in blue ink that reads "Ross McKinney, Jr., MD". The signature is written in a cursive style with a large initial "R" and "M".

Ross McKinney, Jr., MD
Chief Scientific Officer

cc: David J. Skorton, MD, AAMC President and Chief Executive Officer