



**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

August 14, 2015

Office of the Director
National Institutes of Health
9000 Rockville Pike
Bethesda, Maryland 20892

RE: Request for Information (RFI): Inviting Comments and Suggestions on a Framework for the NIH-Wide Strategic Plan (NOT-OD-15-118)

The Association of American Medical Colleges (“AAMC”) appreciates the opportunity to comment on the framework for the NIH-wide Strategic Plan. The AAMC is a not-for-profit association representing all 144 accredited U.S. medical schools, nearly 400 major teaching hospitals and health systems, and 90 academic and scientific societies. Through the AAMC’s member institutions and organizations, the Association represents 148,000 faculty members, 83,000 medical students, 115,000 resident physicians, and thousands of graduate students and postdoctoral trainees.

The AAMC fully supports the NIH’s proposed framework and suggests several points of consideration as the NIH continues development of the Strategic Plan. We agree that an agency-wide plan cannot provide an exhaustive overview of the myriad scientific directions and questions supported by NIH funding. We also agree that opportunities for specific disease applications are best addressed in the strategic plans from the NIH’s Institutes, Centers, and Offices, which are able to focus on research strategy for these issues at the appropriate level of detail.

The AAMC believes that the current framework of the plan outlining the three Areas of Opportunity—fundamental science, health promotion/disease prevention, and treatments/cures—captures the most pressing and emerging opportunities in biomedical research for the NIH. The AAMC recognizes the unique role of the NIH in supporting the nation’s biomedical research enterprise, particularly in its funding of basic science—the foundation for translation into treatments and cures. We appreciate that the proposed plan accommodates the rapidly changing scientific landscape: expansion in both “-omics” and systems-level biology; an exponential increase in amounts of data produced from research itself, including medical records and many other sources; and a progression of challenges beyond traditional categories of organ- or disease-

based research. These changes are also accompanied by the recognition that studying healthy individuals is necessary to achieve a more complete understanding of the biological basis of disease.

The AAMC has also long supported building an evidence base to eliminate health disparities and would like to stress that such development involves a systems approach across the Areas of Opportunity to understand the causes of inequity at individual, community, and societal levels, and the interactions between those causes. Additional opportunities to narrow health inequities will come from incorporating the social determinants of health into all aspects of medical research. We encourage the NIH to ensure the further development of evaluation, implementation, and dissemination science so that successful, evidence-based interventions can be scaled and spread.

The AAMC supports a Strategic Plan that can be updated or revised as needed to fit the goals and unpredictable nature of scientific research, particularly when attempting to bring together diverse disciplines in the biomedical, social, behavioral or other sciences. As a fundamental matter, public health needs and disease burden should factor into setting funding priorities to adequately address issues including the emergence of new health threats and the ongoing burden of chronic disease. However, the plan should also retain enough flexibility to take advantage of rapidly changing tools and techniques; new opportunities that arise during the course of investigation; and other shifts in the research ecosystem.

The AAMC also encourages the NIH to develop a Strategic Plan that complements the plans and research goals of other agencies in the Department of Health and Human Services and to explore opportunities for collaboration where possible, with the shared goal of improving the health of the nation.

The Association strongly favors the inclusion of goals to enhance the stewardship of the research enterprise and believes the conduct of research and development of the biomedical workforce are critical factors to the NIH successfully carrying out its mission. Specifically:

- The AAMC recommends that the Strategic Plan support efforts to broaden the scope of research training programs and encourage the continued development of initiatives that support a diverse workforce.
- In the interest of reducing administrative burden associated with research regulations, the AAMC encourages the NIH whenever possible to engage in efforts at harmonization and retrospective review of regulations to determine if they are leading to the desired outcome.
- The AAMC strongly supports the ongoing NIH efforts to improve research rigor and reproducibility through new guidelines, updated grant policies, and training for

researchers at all levels. These concepts are vital for the creation of a learning research system, which benefits researchers and is essential for scientific progress.

- The AAMC urges that the Strategic Plan emphasize the value of research partnerships, which are essential to advance our understanding of biomedical science and translation of basic research into clinical care.

The AAMC is again grateful for this opportunity to comment and appreciates the efforts of the NIH to gather input from the research community and general public as it develops a Strategic Plan. We would be happy to provide any further assistance to the NIH as it moves forward in this process. Please feel free to contact me, or my colleagues Stephen Heinig, Director of Science Policy (sheinig@aamc.org) and Anurupa Dev, Ph.D., Science Policy Analyst (adev@aamc.org), with any questions about these comments.

Sincerely,

A handwritten signature in cursive script that reads "Ann Bonham".

Ann C. Bonham, Ph.D.
Chief Scientific Officer