



November 9, 2023

Tyrone Spady, Ph.D.,
Director of the Science Policy Coordination, Collaboration & Reporting Division
Office of Science Policy
National Institutes of Health
6705 Rockledge Drive, Suite 630
Bethesda, MD 20892

Re: Request for Information on the National Institutes of Health DRAFT Scientific Integrity Policy

Dear Dr. Spady,

On behalf of the American Association of Colleges of Osteopathic Medicine (AACOM), thank you for the opportunity to comment and provide feedback on the National Institutes of Health (NIH)'s DRAFT NIH Scientific Integrity Policy. AACOM supports the NIH's goal of promoting a culture of scientific integrity and establishing a diverse and equitable environment that fosters scientific innovation.

AACOM believes that the physicians and scientists trained at our nation's colleges of osteopathic medicine (COMs) play an important role in growing this enhanced community. We stand ready to work with you and your colleagues to explore methods that will strengthen scientific integrity and advance NIH research.

Increasing Osteopathic Representation on NIH Federal Advisory Committees

The NIH policy states that Federal Advisory Committees (FACs) are needed "for ensuring the credibility, quality, and transparency of NIH science." AACOM agrees with that position and is committed to assisting NIH in "select[ing] members to serve on scientific and technical FACs based on expertise, knowledge and contribution to the relevant subject area." **We believe that this goal can be achieved by greater representation from the osteopathic profession.**

Although COMs comprise one quarter of all medical schools, they are severely underrepresented on NIH scientific review groups, advisory councils, and Boards of Scientific Counselors 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. Only 1 DO sits on an NIH Board of Scientific Counselors. In fact, DOs have lower than 1 percent representation in critical positions within NIH despite representing twenty-five percent of all medical students.

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.

The 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.**¹ On the other hand, allopathic medical schools receive 42 percent (\$25.11 billion) of the NIH's \$59.27 billion research budget.² 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.

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 scientific integrity of the NIH through improved osteopathic representation. We respectfully offer the following recommendation to achieve this goal:

Ensure representation from the osteopathic profession on NIH Federal Advisory Committees. Researchers at colleges of osteopathic medicine are qualified and available to serve on NIH scientific and technical FACs. The NIH Scientific Integrity Policy should ensure that researchers from osteopathic and allopathic medical schools are represented on policy committees to increase diversity and provide the greatest breadth and depth of knowledge and expertise.

On behalf of our nation's osteopathic medical schools, their medical students, 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 the Scientific Integrity Policy. Please contact me at dbergman@aacom.org if AACOM can provide further clarification or information.

¹ NIH Reporter, available at <https://reporter.nih.gov/search/gVVIo6UHiEa0GkXng7-Idg/projects>

² NIH Reporter, available at https://reporter.nih.gov/search/29_xshqmRU2RdZfREbhLnA/projects



Sincerely,

A handwritten signature in black ink that reads "David A. Bergman". The signature is written in a cursive style with a long, sweeping horizontal line extending to the right.

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