



**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

November 3, 2023

NIH Office of Science Policy
9000 Rockville Pike
Bethesda, Maryland 20892

Re: Request for Information on the DRAFT Scientific Integrity Policy of the National Institutes of Health (88 FR 65696)

Submitted electronically at <https://osp.od.nih.gov/comment-form-draft-scientific-integrity-policy-for-the-national-institutes-of-health/>.

The Association of American Medical Colleges (AAMC) appreciates the opportunity to provide feedback to the National Institutes of Health (NIH) 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 158 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."

AAMC recently commented on the HHS draft scientific policy³ and appreciates NIH's engagement of the scientific community as it also develops a scientific integrity policy based on the OSTP framework. The importance of having formalized scientific integrity policies across the federal government, and particularly for NIH, 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 included vaccine hesitancy and a surge of dissemination of misinformation regarding viruses and immunity and scientific research. As we have seen, public attitudes toward science impact not only the federal government, but the whole of the scientific community and enterprise, including the nation's ability to effectively respond to ever greater health threats.

Overall, we are very encouraged by the draft policy that has been proposed by NIH 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 designated responsibilities for a Chief Scientist (CS), Scientific Integrity Official (SIO) and Scientific Integrity Council to formalize and ensure policy adherence and implementation. We note that the CS and SIO roles have been assigned to existing leadership positions at NIH which are already responsible for extremely sizeable portfolios and recommend that NIH consider closely the resourcing and staffing needed to successfully execute the policy.

We would also like to reiterate our previous comments² on the importance of evaluation as NIH 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 appreciate that NIH intends to regularly evaluate the policy and develop and implement a monitoring and evaluation plan to better understand ongoing scientific integrity activities and outcomes. We strongly encourage the agency to amend this draft so that the final policy includes

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>.

³ AAMC Letter to HHS re: Request for Comments on the Draft HHS Scientific Integrity Policy (88 FR 46802). Sept. 1, 2023. <https://www.aamc.org/media/69396/download?attachment>

additional detail on what measures will be collected and reported under this plan, to increase transparency and provide assurance that the scientific integrity policy is achieving the intended outcomes. We also recommend that any proposals to amend the policy involve an opportunity for community input, whether through town halls, webinars, or more formal requests for information. We are very appreciative of the work NIH has undertaken to formalize a scientific integrity policy. The AAMC looks forward to continued engagement with NIH as the policy is finalized and implemented. Please feel free to contact me or my colleague Anurupa Dev, PhD, Director of Science Policy and Strategy (adev@aamc.org) with any questions about these comments.

Sincerely,

A handwritten signature in blue ink that reads "Heather H. Pierce". The signature is written in a cursive, flowing style.

Heather H. Pierce, JD, MPH
Acting Chief Scientific Officer
Senior Director for Science Policy and Regulatory Counsel

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