August 12, 2015

Francis Collins, MD, Ph.D.
Director, National Institutes of Health
Bethesda, Maryland 20892

Dear Dr. Collins:

The Association of Schools and Programs of Public Health (ASPPH) appreciates the opportunity to comment on the suggested framework for the NIH-wide Strategic Plan. ASPPH is the voice of accredited academic public health, representing schools and programs accredited by the Council on Education for Public Health (CEPH). Our mission is to transform public health by strengthening and promoting the education, research, service, and practice activities of CEPH-accredited schools and programs. We realize the difficulty of NIH’s task in creating an NIH-wide strategic plan in the short time allotted by Congress and given that most, if not all, of the NIH institutes, centers, and offices have their own strategic plans or research visioning documents.

ASPPH offers the following specific comments regarding the suggested framework:

- While we enthusiastically support the inclusion of a “Health Promotion/Disease Prevention” opportunity area in the Strategic Plan, the illustrative bullets cause us concern. The Strategic Plan should support a life course approach to prevention and the creation of long-term health. In addition, as recommended by the NRC and IOM in their *Shorter Lives, Poorer Health* report, we believe NIH “should commit to a coordinated portfolio of investigator-initiated and invited research devoted to understanding the factors responsible for the U.S. health disadvantage and potential solutions, including lessons that can be learned from other countries.” The plan must forthrightly address how the investment in NIH will ameliorate health disparities in the U.S. Such approaches do not fit well into any one NIH institute, which makes their inclusion in an NIH-wide and trans-institute strategic plan most appropriate. Mechanisms to promote and fund such research need to be developed.

- The draft framework suggests that NIH will not provide sufficient emphasis to advancing translational research, which involves the clinical, prevention, implementation, and organization/systems sciences. Substantial research investments are required to advance the sophisticated research required to empirically evaluate the probability of success, costs, and value to society of translation at multiple levels of the health sciences continuum. NIH also should address its role in providing research findings to help policy makers determine how to best invest in health.

- NIH should place a strong emphasis on research regarding the broad range of social and environmental influences on population health, as well as on research to quantify and document how improvements in population health can lead to
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enhanced economic productivity and prosperity, while reducing demand on the health care system. More specifically, we believe it is essential for NIH to address how it will support research on the health effects of environmental change as well as the impact of the environment on health more generally.

- In general, the strategic plan must explain to the taxpayers --with some specificity-- how the National Institutes of Health will advance the nation’s collective health and not solely advance scientific knowledge.

Please do not hesitate to reach out to us if you have any questions or if we can be of further assistance.

Sincerely,

[Signature]

Harrison C. Spencer, MD, MPH, DTM&H, CPH
President and CEO