

August 14, 2015

Lawrence A. Tabak, D.D.S., Ph.D.
Principal Deputy Director
National Institutes of Health
Building 1, Room 126
Bethesda, MD 20892-2290

Dear Dr. Tabak:

On behalf of our 158,000 members, we are pleased to comment on the National Institutes of Health (NIH) proposed framework for the 5-year NIH-Wide Strategic Plan. We offer these comments in response to your Dear Colleague email of July 22, 2015.

We are generally pleased with the strategic framework NIH has proposed. The opportunities identified to promote cross-cutting research are largely consistent with the biennial research agenda developed by the ADA Council on Scientific Affairs, which highlights clinically relevant critical issues needing scientific exploration.

As a science-based organization, the ADA has a vested interest in ensuring that federal dental research agencies are well funded, their research investments reflect the needs of the dental profession, and the knowledge gained advances the oral and general health of the American public. The framework you have proposed will help advance those goals.

We appreciate the opportunity to comment on proposed framework for the NIH-Wide Strategic Plan. If you have any questions, please contact Mr. Robert J. Burns at 202-789-5176 or burnsr@ada.org. Information is also available at ADA.org/advocacy.

Sincerely,

/s/

Maxine Feinberg, D.D.S.
President

MF:KTO:rjb
Enclosure

/s/

Kathleen T. O'Loughlin, D.M.D., M.P.H.
Executive Director

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National Institutes of Health Proposed Framework for the NIH-Wide Strategic Plan

August 14, 2015

On behalf of our 158,000 members, we are pleased to comment on the National Institutes of Health (NIH) proposed framework for the 5-year NIH-Wide Strategic Plan. We offer these comments in response to your Dear Colleague email of July 22, 2015.

A. Potential benefits, drawbacks/challenges, and areas of consideration for the current framework

We agree that the greatest opportunities for cross-cutting research are promoting fundamental science, improving health promotion and disease prevention, and advancing treatment and cures.

A major objective of the ADA is to promote a good quality of life by improving the oral health of the public and encouraging optimal health behaviors. Fundamental science is key to evaluating risk assessment, risk communication, and other risk management strategies, and is essential for promoting various aspects of overall health, including oral health.

Engaging dental health professionals is a means to address two of the treatment and cures objectives, namely breaking down traditional disease boundaries and developing partnerships. The developing evidence base on approaches to eliminate health disparities demonstrates efficacy of involving the complete spectrum of health professionals, which includes dental health professionals.

The ADA is encouraged that this is part of the framework NIH has proposed.

B. Compatibility of the framework with the broad scope of the NIH Mission

The proposed framework for the NIH-wide strategic plan appears wholly consistent with its mission to seek fundamental knowledge about the nature and behavior of living systems and the application of that knowledge to enhance health, lengthen life, and reduce illness and disability. Enhanced understanding about risk assessment, risk communication, and other risk management strategies will be needed to ensure that the knowledge that is developed is translated into the desired outcomes of enhancing health, reducing illness and disability.

C. Additional concepts in ICO strategic plans that are cross-cutting and should be included in this trans-NIH strategic plan

We recommend additional emphasis be placed on evaluating the safety and effectiveness of new and existing diagnostic, therapeutic methods, instruments, and technologies used in the prevention, management, and treatment of disease in overall health including oral health. Understanding the factors affecting access to and appropriate utilization of health care including

dental services will be required for NIH to succeed with its mission. Funding support should be given to expand the use of non-invasive samples, including those available in the oral cavity (e.g. saliva, gingival crevicular fluid) that can be used for screening, diagnosis, and disease monitoring.

Another area that should cut across the ICO strategic plans is an emphasis on data science. Developing approaches to improve access to data and people trained in its exploration are critical to its meaningful use.

D. Comprehensive trans-NIH research themes that have not been captured in Areas of Opportunity that Apply Across Biomedicine

We suggest emphasizing the investigation, development, and clinical evaluation of therapies and therapeutic materials appropriate for prophylaxis, tissue engineering, healing and/or regeneration of structures and soft tissues, including those in the oral cavity. In addition, we encourage resource allocation to develop, test, and validate methods for assessing integration of evidence-based clinical recommendations into clinical practice, including dentistry.

Multidisciplinary efforts examining the interrelation of all systemic conditions and diseases as well as the impact of their treatments will be required to improve the overall health and healthspan of the public.

E. Future opportunities or emerging research needs

We are encouraged by NIH's recognition that 'data science increases the impact and efficiency of research' and contend that it will result in increased support, dissemination and application of evidence-based practice in healthcare including dentistry.

Additional efforts should be taken to further develop and implement improved methods and processes coming out of the work of practice-based research networks, to help ensure clinically relevant research questions are addressed, and to promote collaborative investigation of preventive and therapeutic interventions, which can support advancement of health care, including oral health.

Most new advances in prevention and treatment do not reach patients in a timely manner. Dentists and other healthcare professionals fail to adopt new approaches even when they are clearly superior to existing approaches, and they often fail to discontinue using therapies when they are shown to provide no benefit. Research is needed to better understand why practitioners do not adopt new and better approaches and how to get them to adopt appropriate approaches.

Increased investment in this area (e.g., implementation of evidence based practices) is vital to improve patient outcomes. This includes the need to develop a strong evidence base regarding efficacy of health promotion activities to help address health disparities. Consideration of those interventions effecting change at the individual, population, and policy level will all need to be examined with respect to their efficacy to attain the desired aims of improving health and preventing disease.