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March 12, 2021

Helene Langevin, M.D.
Director, National Center for Complementary and Integrative Health
National Institutes of Health
9000 Rockville Pike Bethesda, Md. 20892

RE: Request for Information (RFI): Inviting Comments on the NCCIH Strategic Plan for Fiscal Years 2021-2025 (NOT-AT-21-005)

Dear Dr. Langevin:

The American Chiropractic Association (ACA) appreciates the opportunity to comment on the Request for Information (RFI) number NOT-AT-21-005, *“Inviting Comments on the NCCIH Strategic Plan for Fiscal Years 2021-2025,”* released February 8, 2021.

ACA is the largest professional organization in the United States representing doctors of chiropractic (DCs). ACA members lead the chiropractic profession through collaborative relationships in public health, support for research and evidence-based practice, and the active reporting of functional outcome assessment measures to ensure the health and well-being of the estimated 35 million Americans who seek chiropractic care each year.

ACA appreciates NCCIH’s willingness to engage with stakeholders in this critical process and is encouraged by the inclusion of suggestions from [comments](#) submitted to RFI NOT-AT-20-013 reflected in the Draft Strategic Plan. We submit the following as requested in the most recent RFI in collaboration and shared dedication to the advancement of human health:

Objective 1: Advance fundamental science and methods development

ACA applauds the NCCIH for highlighting an interest in advancing the study of multimodal systems *“including those with diagnostic and therapeutic frameworks different from those of conventional medicine.”* (pg 15) However, ACA again strongly urges NCCIH to further dedicate resources *specifically* to further the study of nonopioid approaches to treat chronic, musculoskeletal conditions including chiropractic, manual and osteopathic manipulation. The advancement of safer pain management remains a primary goal of the ACA. Evidence-based and scientifically sound strategies that encourage patients and health care providers to first exhaust conservative treatments is a critical tool in the ongoing fight against wide-spread opioid misuse.

ACA supports increased mechanistic research and investigation of the fundamental science relevant to body-based approaches, including manipulation, and applauds the NCCIH for addressing gaps in the understanding of the mechanisms and their effects.

Objective 2: Advance research on whole person health and on the integration of complementary and conventional care

ACA is pleased that the NCCIH will take a less homogeneous approach to research with this new strategic plan and applauds the willingness to utilize fundamental scientific methods to explore a comprehensive program in whole person research. The expansion of integrated multimodal therapies to monitor efficacy and replication will certainly improve with increased funding opportunities.

ACA supports NCCIH in pursuing innovative research methodologies to collect and utilize real-world data about the use and efficacy of complementary and integrative health care approaches, alone and when used in conjunction with conventional approaches. Specifically, it is important to conduct dissemination and implementation (D&I) studies to address systemic barriers to integrating high value CIH services, like those delivered by chiropractors, within mainstream healthcare.

Objective 4: Enhance the complementary and integrative health research workforce

The promotion of interdisciplinary collaborations in academia and at the institutional level remains a priority for the ACA and we look forward to the development of an NCCIH “virtual resource center (university without walls.) The ACA stands ready to support the NCCIH as such models are developed and again applauds the dedication to interdisciplinary collaborations. Increased opportunities in basic, mechanistic, translational and clinical research to advance scientific knowledge of spinal manipulation and extremity joint manipulation will help to address the U.S. musculoskeletal disease burden. To this end, ACA encourages NCCIH to also support cross-disciplinary mentorship programs from early to mid-career chiropractic and other researchers to increase overall institutional research capability, supporting in particular researchers whose primary appointments are within CIH academic institutions.

Objective 5: Disseminate Objective-Evidence-Based Information on Complementary and Integrative Health Interventions

ACA strongly supports the mission outlined in the Notice of NIH's Interest in Diversity¹ and encourages the NCCIH to continue and advance efforts to increase the involvement of underrepresented minorities (URM) in complementary and integrative health research. ACA again urges NCCIH to commit significant resources to the identification and eradication of disparities in access to complementary and integrative healthcare, to improve patient outcomes.

¹ <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-20-031.html>

Research and development of evidence-based strategies to combat chronic pain are only part of the solution to address the U.S. pain epidemic –information about safe and effective nondrug alternatives, like chiropractic, must be effectively disseminated to providers and patients. Increasing awareness of and education on evidence-based, complementary and integrative health systems is a shared responsibility. ACA supports NCCIH in this effort and is available to collaborate efforts to ensure that evidence-based and scientifically sound information reaches policy-makers and the public. Further, ACA recommends that NCCIH develop specific funding opportunities to address research gaps in knowledge translation or dissemination and implementation (D&I.) Primary care clinical practice guidelines recommend non-pharmacological approaches, like chiropractic, as a first line treatment² to prevent acute low back pain from becoming chronic. The inclusion of this is an example of the dissemination of knowledge but does not address the barriers that exist to the implementation of chiropractic and other services. While NCCIH has published generic R21 and R01 funding opportunities, none target specific D&I research gaps. ACA strongly recommends that NCCIH develop funding opportunities for D&I studies that address the disparities that exist in our health care system with respect to the *implementation* of chiropractic and other complementary and integrative health interventions.

Emerging and re-emerging research needs in complementary and integrative health care will only increase in the coming years. We are confident that NCCIH is well prepared to address these and other needs of a changing world. As the ongoing COVID-19 pandemic has shown, interdisciplinary and innovative solutions improve patient outcomes and safety.

ACA appreciates the opportunity to comment and stands ready to assist you and the NCCIH as this strategic plan is finalized and implemented.

Sincerely,

A handwritten signature in black ink, appearing to read "Michele Maiers", is written over a light gray rectangular background.

Michele Maiers, DC, MPH, PhD
President

² <https://pubmed.ncbi.nlm.nih.gov/33591367/>