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National Institutes of Health
Office of Extramural Research
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To Whom It May Concern:

The Society for Women's Health Research® (SWHR) is pleased to submit comments regarding the five-year National Institutes of Health (NIH) Strategic Plan Framework. SWHR, a national non-profit organization based in Washington, DC, is widely recognized as the thought leader in promoting research on sex differences and is dedicated to improving women's health through advocacy, education, and research. SWHR believes the NIH Strategic Plan Framework provides a general structure for the disparate NIH Institutes & Centers and fits within the NIH mission, however, suggests revisions that outline additional strategies regarding NIH-wide policies and activities.

SWHR believes this framework is compatible with the NIH mission to seek knowledge regarding the nature and behavior of living systems. However, possibly due to the brief nature of the framework, it appears to have a limited focus on translating this research to real world health implications for American families, beyond eradication of a pandemic or elimination of health disparities. This is a specific issue for women, as general understanding of symptoms, prevention, and treatment of disease still emphasizes the male model in research. We believe that NIH should use the draft strategic plan to provide additional details for these and other bullet points, providing clarity on its plans to translate research to cures and treatments for all patients.

In addition, NIH should also specify how it plans to translate knowledge gained from extra- and intramural research to the general public. One option could include the addition of a "Research Dissemination" bullet point under the "Treatment/Cures" or "Enhancing Stewardship" sections of the framework. This bullet point could incorporate developing educational materials, use of social media, and other approaches to reach a non-science/research-focused public with NIH innovations.

SWHR applauds NIH for incorporating disease burden as an important but not sole consideration for priority setting. However, the U.S. prevalence/incidence of disease should not limit the NIH obligation to consider other factors, such as rare disease, diseases that disproportionately affect women and minorities, and severity of morbidity/mortality when setting such priorities. Often, these factors can be overlooked when developing funding announcements and setting strategic priorities for the agency. Research supporting an equal academic commitment and financial investment in diseases and disorders that disproportionately affect women and minority populations will lead to greater understanding of sex and racial/ethnic differences in the development and prevention of such illnesses.

We were disappointed that the NIH framework does not address the recent policy change regarding inclusion of both male and female cells and animals in preclinical research; nor the need to improve the participation of women and minorities in dual sex human subject research. Inclusion of this policy is imperative to ensure that it is implemented and emphasized across all Institutes and Centers. Further, expansion of this policy to ensure proper recruitment, inclusion, reporting, and analysis of male, female, and minority participants reflective of the U.S. population in all medical research is key to advancing precision medicine and expediting research translation to cures and treatments for patients.

Finally, NIH should incorporate its plans for the Precision Medicine Initiative into both this framework and the draft strategic plan. Given the Administration's focus on precision medicine and Congressional interest in the initiative, NIH should address its plans to recruit the one million American national research cohort and other activities that may occur over the next five years. SWHR advises NIH to ensure that this national cohort is as reflective of the American population as possible, with inclusion of a proportionate number of women and minority participants, to ensure research findings are reproducible and rigorous for all populations.

Thank you for this opportunity to submit comments for the NIH Strategic Framework. SWHR looks forward to seeing the final product and working with the NIH to improve the health of all Americans.

Sincerely,




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