March 12, 2021

Helene Langevin, MD  
Director  
National Center for Complementary and Integrative Health  
National Institutes of Health  
9000 Rockville Pike  
Bethesda, Maryland 20892

RE: NOT-AT-20-013 – Request for Information: Soliciting Input for the National Center for Complementary and Integrative Health’s New Strategic Plan

Dear Director Langevin,

The American Academy of Nursing (Academy) and the Council for the Advancement of Nursing Science (CANS) appreciate the opportunity to offer comments regarding the National Center for Complementary and Integrative Health’s (NCCIH) new strategic plan for fiscal years (FY) 2021-2025. The Academy serves the public by advancing health policy through the generation, synthesis, and dissemination of nursing knowledge. Academy Fellows are inducted into the organization for their extraordinary contributions to improve health locally and globally. With more than 2,900 Fellows, the Academy represents nursing’s most accomplished leaders in policy, research, administration, practice, and academia. As the scientific voice for the Academy, CANS formulates and advances research, scientific training, and career development within the profession. In the effort to promote better health, CANS enhances communication among nurse scientists and the public to develop, disseminate, and utilize nursing research.

The vision of the Academy is healthy lives for all people. To actualize this vision, the Academy’s mission is to improve health and achieve health equity by impacting policy through nursing leadership, innovation, and science, through four primary goals.\(^1\) Three of the Academy’s four goals are reflected in the draft strategic plan. Specifically, the goals to:

- influence policy that achieves health equity, promotes wellness, eliminates racism, and improves health care delivery;
- integrate nursing science into health, wellness, and social justice decisions; and
- disseminate nurse-driven innovation to reduce inequities and improve health.

Review of the draft strategic plan by the Academy and CANS found that the draft plan is fully aligned with the nursing discipline both from a clinical practice point of view as well as the translation of nursing research into practice. Our comments reflect our articulation, focus, and understanding of diversity, equity, inclusion, precision health, and population health perspectives within the context of nursing science. While the NCCIH is expanding and building on current activities in addition to advancing new strategies and ideas, the Academy and CANS encourages the NCCIH to consider a few overarching suggestions for the draft plan. Our review found the plan’s objectives to be quite broad, which suggests the NCCIH would need to partner and coordinate with other institutes within the National Institutes of Health on this research agenda. In addition, we recommend the NCCIH imbed health equity and social determinants of health throughout the draft strategic plan to connect each and every objective of the draft plan.
Objective One: Advance fundamental science and methods development
The Academy has a clear and distinct focus on health equity and uses this lens to advance policies and solutions. We advance policies that protect and enrich safe and healthy communities. The Academy believes that to truly improve health, policies must expand access to quality care across the lifespan through novel approaches, aimed at eliminating discrimination and racism and improving health equity. This requires a distinct focus on removing disparities and enhancing the care experience. The Academy and CANS recommend the NCCIH incorporate health equity and the social determinants of health into this first objective.

Objective Two: Advance research on whole person health and integration of complementary and conventional care
While the Academy and CANS applauds the NCCIH’s positive emphasis in the strategic plan on the whole health and well-being of the person, we strongly encourage NCCIH to consider diversity and interindividual variability broadly rather than a “one size fits all” approach to health and healthcare. Additionally, the Academy and CANS are concerned with the lack of representation on the impact of a person’s spirituality in their health journey. For example, there are numerous studies related to quality of life and the role of spirituality alleviating patients’ suffering after a stroke. One particular study found that a “greater awareness of the importance of spirituality among clinicians and nurses may improve cultural competence in healthcare services.” We encourage NCCIH to consider including this concept into research support for the integration of complementary and conventional care.

Additionally, we recommend that NCCIH consider precision healthcare broadly in the draft strategic plan. The draft plan focuses on the whole health of the person, but does not include the concept of how this research would be individually tailored during implementation and dissemination—the goal of precision healthcare. The Academy and CANS recommends NCCIH include a precision health approach that also includes social, economic, and cultural status assessments to ensure health equity in the draft strategic plan.

Objective Three: Foster research on health promotion and restoration, resilience, disease prevention, and symptom management
The third bullet point states “Conduct rigorous clinical studies on the effectiveness, dissemination, and implementation of complementary approaches to health care.” The Academy and CANS recommend NCCIH strongly consider conducting rigorous studies that are inclusive of those that are community-based as well. Additionally, we advise NCCIH to include research related to the diversity of cultures as it relates to alternative and complementary medicine. The Academy and CANS further recommend that the NCCIH consider the need to incorporate qualitative and mixed methods designs into this type of research.

Objective Four: Enhance the complementary and integrative health research workforce
Our organizations recommend NCCIH ensure that the health research workforce is broadly representative of the various disciplines of the healthcare workforce. As the draft strategic plan is aligned with the nursing discipline, we encourage NCCIH to strongly consider the inclusion of nurse scientists in this objective. This will be vitally important as there not only needs to be diversity in the various disciplines in the health workforce, but also in the diversity of the workforce itself.

Objective Five: Disseminate objective evidence-based information on complementary and integrative health interventions
The Academy and CANS recommend the draft strategic plan include the development of the science of dissemination and implementation to enhance the uptake and sustainability of the research. We further recommend partnering with community stakeholders to disseminate evidence-based information. This objective is very broad and would suggest a more specific strategy be incorporated into the draft plan. In
addition, we recommend the NCCIH consider the social, economic, and cultural factors that pertain to sustainability and uptake of these interventions especially in vulnerable and under-served populations. We suggest NCCIH add an additional bullet in objective five that calls for the development and uptake of the science in order to be more proactive in the dissemination of these health interventions. This will require the NCCIH to strategically collaborate and partner with stakeholders of interest.

The Academy and CANS thank you for the opportunity to provide comments to the NCCIH strategic plan for FYs 2021-2025. If we can be of any assistance to you or your staff, please do not hesitate to contact the Academy’s Senior Director of Policy, Christine Murphy, at cmurphy@aannet.org or 202-777-1174.

Sincerely,

Eileen Sullivan-Marx, PhD, RN, FAAN  
President  
American Academy of Nursing

Nancy S. Redecker, PhD, RN, FAHA, FAAN  
Chair  
Council for the Advancement of Nursing Science

cc: Mary Beth Kester, MS – Director, Office of Policy, Planning, and Evaluation at the National Center for Complementary and Integrative Health

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