



800 Maine Avenue, S.W.
Suite 900
Washington, D.C. 20024

January 1, 2020

Board of Trustees
2019-2020

Bruce J. Schwartz, M.D.
President
Jeffrey Geller, M.D., M.P.H.
President-Elect
Sandra DeJong, M.D., M.Sc.
Secretary
Gregory W. Dalack, M.D.
Treasurer

Joshua Gordon, MD, PhD
Director, National Institute of Mental Health (NIMH)
National Institutes of Health
6001 Executive Blvd
Bethesda, MD 20892

84 FR 66210 – National Institute of Mental Health Draft Strategic Plan for Research

Dear Dr. Gordon,

Altha J. Stewart, M.D.
Anita S. Everett, M.D.
Maria A. Oquendo, M.D., Ph.D.
Past Presidents

Eric M. Plakun, M.D.
Vivian B. Pender, M.D.
Kenneth Certa, M.D.
Cheryl D. Wills, M.D.
Jenny L. Boyer, M.D., Ph.D., J.D.
Melinda L. Young, M.D.
Annette M. Matthews, M.D.
Ayana Jordan, M.D., Ph.D.
Rahn Kennedy Bailey, M.D.
Richard F. Summers, M.D.
Rana Elmaghraby, M.D.
Michael Mensah, M.D., M.P.H.
Trustees

Assembly
2019-2020

Paul J. O'Leary, M.D.
Speaker
Joseph C. Napoli, M.D.
Speaker-Elect
Mary Jo Fitz-Gerald, M.D., M.B.A.
Recorder

Administration

Saul Levin, M.D., M.P.A.
CEO and Medical Director

On behalf of the American Psychiatric Association (APA), the national medical specialty society representing 38,500 physicians specializing in psychiatry, we appreciate the opportunity to comment on the National Institute of Mental Health (NIMH) 2020 Strategic Plan for Research. We support the direction of the plan and applaud your work to further our understanding of, and advance treatments for, mental illness. With 47.8 million Americans aged 18 and older having a mental illness¹ and suicide rates on the rise, especially among young Americans age 15 to 25,² an urgent need exists for the work of NIMH to reduce the impact of mental illness on individuals, families, and communities.

The Strategic Plan continues important themes such as a continued focus on understanding the neural basis of disease and advancing the treatments available. It recognizes that major translational gaps remain between NIMH-funded basic research and clinical practice and continues to emphasize ways to close that gap with a strong focus on understanding development and disease trajectories to identify forms of early intervention. There is also explicit mention of the need to reduce mental health disparities and promote equity that we strongly urge, while recognizing the importance of focusing on suicide prevention and the potential of digital health to improve access, availability, utilization, and quality of mental healthcare services.

While we applaud much of the plan, we urge you to consider the following:

Elaborate on the role of NIMH to promote information sharing. There is remarkable variance among institutions in terms of practices for making registry/electronic health record-based data widely available for secondary analysis. A generally accepted standard is not available, for example, when opt-out consent might be more

¹ Substance Abuse and Mental Health Services Administration. (2019). Key substance use and mental health indicators in the United States: Results from the 2018 National Survey on Drug Use and Health (HHS Publication No. PEP19-5068, NSDUH Series H-54). Rockville, MD: Center for Behavioral Health Statistics and Quality, Substance Abuse and Mental Health Services Administration. Retrieved from <https://www.samhsa.gov/data/>

² Curtin SC, Hedegaard H. Suicide rates for females and males by race and ethnicity: United States, 1999 and 2017. NCHS Health E-Stat. 2019.

appropriate for population-based research. NIMH could help to promulgate such standards, which would accelerate data collection and sharing. This would be particularly relevant for studies to fully include "participants from diverse racial and ethnic backgrounds, and across gender identities, socioeconomic status, neurotype, and age – offering the best possible representation".

Include more detail on NIMH's workforce/young investigator efforts. Programs such as the BRAINS awards, have now been in place for over 10 years. It would be a benefit to study the outcomes of these programs, consistent with the "experimental medicine" approach that is requested of investigators. We specifically recommend the Strategic Plan include a rigorous reporting of the outcomes of the NIMH's workforce initiatives, with appropriate revamping when things are not meeting goals or not doing as well as other Institutes (e.g., in number of supported MD or MD/PhD or PhD investigators who now hold independent R-series funding). In addition, many early career researchers interested in clinical neuromodulation interventions are needing to acquire skills for processing and analyzing brain imaging and EEG data, programming in MATLAB, and e-field modeling, but training is scarce and should be made more available.

Provide training to develop a workforce able to work with big and complex data sets using novel computational approaches. NIMH has sponsored several 1-day webcast workshops, but these are not sufficient to train and support the researchers who need to incorporate relevant tools. We encourage more attention in this area, as well as training to meet the needs identified under "Harnessing Data". More training is needed to develop the statistical expertise needed to use and analyze the large datasets, specifically for trainees to compete successfully and do rigorous work.

APA has long advocated for increased funding for NIMH to provide needed resources for basic, translational, intervention, and clinical research. As society becomes increasingly aware of the need to research, understand, and treat mental illness, it is critical that all avenues of research are vigorously pursued. APA strongly supports robust federal investment for NIMH and the direction of the Institute. Thank you for soliciting input on this important issue. I look forward to continued collaboration with NIMH. If you have any further questions, please contact APA's Director of Practice Management and Delivery Systems Policy, Michelle Dirst, at mdirst@psych.org.

Sincerely,



Saul M. Levin, M.D., M.P.A., FRCP-E
CEO and Medical Director