AADR Comments: Request for Information Soliciting Input for the Tribal Health Research Office Strategic Plan (FY 2018-2022)
Submitted online on February 2, 2018

What topics would you recommend adding to the THRO Strategic Priority 1: "Enhance Communication and Coordination: Greatly increase the bidirectional flow of information to and from tribal communities, and the NIH Institutes, Centers and Offices, and other relevant stakeholders"?

The American Association for Dental Research (AADR) commends the Tribal Health Research Office (THRO) for incorporating a strategic priority that stresses the bidirectional flow of information between NIH ICOs and stakeholders and tribal communities, which demonstrates a commitment by the NIH to learning from tribal communities and better directing research activities as a result.

Strategic Priority 1 importantly includes a number of objectives related to dialogue with tribal communities and stakeholders, but in further refinements of this strategic plan, AADR recommends that the THRO includes specific references to pursuing direct partnerships with the tribes as well as with the tribal Institutional Review Boards, which play a central role in research. To the extent possible, the THRO should engage AI/AN communities, including in the development of subcontracts. In doing so, the THRO can ensure that an AI/AN team is onsite and can cultivate within the groups a sense of ownership and pride in the research endeavor.

Furthermore, the THRO may also wish to include within the objectives efforts to enhance understanding of the review boards’ work from NIH ICOs, including better understanding tribal requirements and priorities. Better coordination and communication between these two groups could streamline research activities within tribes and on reservations and could keep universities and investigators from being caught in the middle when there are differing views on issues, such as data ownership, approvals of publications, etc.

What topics would you recommend adding to the THRO Strategic Priority 2: "Build Research Capacity: Coordinating efforts to increase research capacity in American Indian/Alaska Native (AI/AN) communities at all levels, e.g., grant writing, professional development, infrastructure needs"?

Strategic Priority 2 is important to “build a strong, coordinated community of AI/AN researchers and expand scientific knowledge to improve AI/AN health.” Building research capacity within the tribes helps ensure the relevance of research and grow the research workforce. A specific approach NIH might consider is employing incentives for the use of tribal employees and interns in funded research activities or collaboration with tribal colleagues.
In terms of research content, as the plan is expanded, oral health should be incorporated as a priority and, as such, included in surveys of health needs. AADR would encourage the THRO to emphasize that oral health is integral to overall health. Not only has research shown links between certain health conditions, such as diabetes, and oral health (those with diabetes are at special risk for periodontal disease), but oral health is also affected by risk factors, such as tobacco and alcohol, and by dietary factors, including consumption of sugar sweetened beverages and other added sugars.

Notably, certain oral diseases and conditions are more prevalent in AI populations than in any other U.S. population groups. Data from the Indian Health Service has shown that 79 percent of AI/AN preschool children had experienced caries, and 68 percent had untreated dental caries, more than three times that of their non-Native peers1. AI/AN populations also experience an extremely high prevalence of diabetes and diabetes-related deaths as well as edentulism (i.e., toothlessness).

An audacious but justifiable goal would be to develop requirements to examine the oral corollaries – effects and responses – of virtually all other health problems being studied in AI/AN populations. We would encourage the THRO to ensure outcomes of both prevention and treatment efforts are studied.

What topics would you recommend adding to the THRO Strategic Priority 3: "Expand Research: Increasingly diversify the research portfolio that occurs at the NIH for AI/AN populations and increase the amount of research that occurs in and for tribal communities"?

In order to help the NIH diversify its research portfolio, the THRO may first wish to consider how to incorporate face-to-face meetings, as appropriate, with tribal populations to open the channels of communication and to hear directly from AI/AN populations about the health concerns and research needs of the community. Additionally, AADR would encourage the THRO to consider implementing programs or activities that allow the current pool of investigators, tribal health personnel and AI/AN populations to share their experiences – laying a foundation for partnerships and collaboration between the groups. Such programmatic activities may include developing a learning community or forum or hosting a state-of-the-science conference. To this end, a related objective for Strategic Priority 3 may involve establishing mechanisms for facilitating collaboration across ICOs that would ensure that health problems are not addressed in isolation, which would also complement tribes’ more holistic view of care.

What topics would you recommend adding to the THRO Strategic Priority 4: "Evaluate Progress: Establish a set of measurements that allows stakeholders to determine if, and to what degree, THRO is successful in achieving strategic priorities and objectives"?

For the fourth strategic priority area, AADR believes it will be particularly useful for the THRO to promote and encourage agency-tribal conversations. In current research practice, a chief

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expectation of tribal review boards is that research must benefit the tribe in some tangible way. Conversations centered on clarifying what exactly this entails as well as establishing a priori agreements related to evaluation standards would be beneficial. To encourage further communication and collaboration, the NIH could have staff attend Tribal Advisory Committee meetings on the NIH research campus or attend initial or final meetings of the tribal review boards tasked with handling multiple NIH grants.

What topics would you recommend adding to the THRO Strategic Priority 5: "Address cross-cutting areas of Cultural Competency and Community Engagement: Ensuring that the NIH employs a consistent, respectful approach when collaborating with tribal communities to achieve each of the previous four strategic priorities"?

AADR lauds the THRO including a priority related to enhancing cultural respect to create an inclusive and equitable partnership with AI/AN communities. Cultural competency in the context of AI/AN communities requires meaningful engagement in the community, and ensuring the involvement of tribal people at most steps of research is critical; it is advisable during planning and essential at the point of implementation.

One mechanism to help promote proper recognition of cultural diversity that the NIH may wish to consider is a requirement to demonstrate cultural sensitivity, such as developing a plan aimed at ensuring cultural competency and community/tribal involvement as a requirement of application for research.