



December 20, 2007

National Institute of Mental Health
Draft Strategic Plan
8280 Greensboro Drive, Suite 300
McLean, Virginia 22102

Dear Colleagues:

The American Psychological Association is pleased to have the opportunity to comment on the draft version (dated Nov. 20, 2007) of the National Institute of Mental Health Strategic Plan. With over 148,000 members, the APA is the world's largest organization of scientific and professional psychologists. The comments presented here are an integration of the views of a wide range of individual members and governance groups of APA.

To begin, APA commends NIMH for the broad and ambitious scope of the draft plan. The four strategic objectives (promote scientific discovery; chart mental health trajectories; develop new and better interventions; and strengthen public health impact) comprise a vision that is at once bold and well grounded in current scientific understanding and approaches. These strategic objectives provide a clear framework for advancing and integrating efforts across many of the research and practice areas that contribute to the prevention and treatment of mental disorders. Especially within a tight budget environment, it is encouraging to see NIMH maintain its commitment to a rich and varied portfolio of basic, clinical, and services research and to the dissemination and implementation of research findings for the benefit of all communities.

In examining the specific points of the plan, however, APA is concerned that the full potential of the strategic objectives is not being met. For example, although the first objective seeks to "promote discovery in the brain and behavioral sciences," nearly all of the particular strategies and bullets that are listed for accomplishing this objective concern research that falls within neuroscience and genetics, with little attention given to the contributions of the behavioral and social sciences. The failure to capitalize on recent progress and opportunities within the behavioral and social sciences is disappointing, as work in those areas is critical for understanding the nature and development of the cognitive, affective, motivational, and social processes that go awry within mental disorders and are the targets of interventions.

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APA urges NIMH to fully and explicitly incorporate behavioral and social science research within all four objectives of the strategic plan. Such research guides, enriches, and complements work in neuroscience and genetics by characterizing the larger behavioral and social systems in which the brain and its underlying genetic and molecular processes operate. Further progress in developing effective forms of therapy, rehabilitation, and service delivery is also dependent upon continued advances in basic and translational behavioral and social science. While a complete understanding of mental disorders must include an account of the function of brain mechanisms, processes at higher levels of analysis also play significant roles and should be investigated.

Much of the draft plan indicates that NIMH will only support projects in behavioral and social science that also include measures of brain function or that directly address particular disorders. But no clear justification for this approach is provided. If adopted, this approach would result in reduced funding for many productive areas of research that contribute to understanding mental disorders, such as nonhuman animal studies of social behavior and computer modeling of cognition. APA agrees that NIMH should support a research portfolio that is focused on the intersection of brain, behavior, and mental health. Such a portfolio, however, must not exclude studies of normal behavior that are pursued entirely at the behavioral or social level of analysis (just as it does not exclude studies of normal brain function that are conducted solely at the neural level).

On this point, it should be noted that the National Advisory Mental Health Council's report *Setting Priorities for Basic Brain & Behavioral Science at NIMH* (2004), as well as more recent statements by the NIMH Director, have clearly indicated that NIMH would continue to support studies of normal behavior that use behavioral measures alone. Also, the 1992 legislation authorizing NIMH requires the Institute to support "the promotion of mental health, and the study of the psychological, social and legal factors that influence behavior" (42 U.S.C. § 285p). As this mandate remains binding after passage of the National Institutes of Health Reform Act of 2006, the NIMH strategic plan should reflect the Institute's mission and should be consistent with the legislative intent of the law.

APA is pleased that the draft plan acknowledges the need to consider the diversity of the population in conducting mental health research. However, it appears that demographic variables (gender, ethnicity, culture, etc.) are only to be examined as correlates of mental health outcomes or as criteria for obtaining representative samples. APA urges NIMH to go further and support research on the social and cultural processes that underlie the variable trajectories and manifestations of mental disorder, as well as treatment responses, across population groups. Basic and translational research on socio-cultural processes (which receives little funding from any federal agency) will provide the explanatory framework for the development of interventions that treat the "whole person," a stated aim of the plan.

APA would also like to raise some general questions about the draft strategic plan. First, how will innovation in research be encouraged? By delineating specific research topics and approaches, the strategic plan may actually discourage work that leads to genuinely

novel insights into brain and behavior. APA suggests that NIMH develop and communicate procedures for ensuring that creative work that is risky or that might not fit the particular categories of the plan can be funded.

More broadly, how will the plan be implemented? Will only research that falls within the specific categories that are listed be supported? Will grant applications that do not fall within the plan be returned to applicants unreviewed? If not, by what criteria will funding be awarded for research that does not fall within the plan's categories? The scientific community needs to be told how the plan will be implemented in order to make preparations for future research and training.

We conclude with some further suggestions for strengthening the strategic plan:

-- The draft says little about aging populations, despite the unique diagnostic, treatment, and service delivery issues that arise for older adults (who often have multiple health problems). The development of culturally appropriate and personalized interventions requires that research be directed to topics surrounding aging.

-- Research on trauma and violence, which are experienced by a large proportion of the population, and their effects on mental health should be included within the plan as a high priority of NIMH. Work in this area should draw from the full range of biological and of behavioral and social science approaches.

-- The draft plan discusses many avenues for empirical research but says little about theoretical and computational modeling research, especially at the systems neuroscience and behavioral levels. Such work, which both explains empirical findings and guides further empirical inquiry, can contribute strongly to the achievement of NIMH's research goals and should be explicitly included within the strategic plan.

APA hopes that NIMH finds these comments helpful. Please contact us if you would like further information. APA stands ready to work with NIMH and the behavioral and social science communities to encourage rigorous and innovative multidisciplinary research that will contribute to understanding the determinants of mental health and disorder and to developing more effective methods for preventing and treating mental disorders.

Sincerely,



Steven Breckler, Ph.D.
Executive Director for Science