



American Society for Nutrition
Excellence in Nutrition Research and Practice

December 29, 2020

James M. Anderson, MD, PhD
Deputy Director for Program Coordination, Planning, and Strategic Initiatives
National Institutes of Health
Building 1, Room 260
1 Center Drive
Bethesda, MD 20892

Submitted electronically via DPCPSIreorgcomments@nih.gov

Dear Dr. Anderson,

The American Society for Nutrition (ASN) appreciates the opportunity to comment on the Proposed transfer of the Office of Nutrition Research (ONR) from the National Institute of Diabetes and Digestive and Kidney Diseases (NIDDK) to the Office of the Director (OD) at the National Institutes of Health (NIH). ASN strongly supports the transfer of the NIH ONR from NIDDK to the OD. ASN supports the transfer of the ONR from NIDDK to the OD because such a transfer will:

- (1) Elevate nutrition research leadership, staffing, and resources supported by NIH,
- (2) Achieve broad interdisciplinary support for nutrition research and allow for increased collaboration and coordination, and,
- (3) Encourage and support the next generation of nutrition researchers.

ASN is a not-for-profit, professional scientific society dedicated to bringing together the world's top researchers to advance our knowledge and application of nutrition. ASN has more than 7,500 members throughout the world, working in government, clinical practice, academia, and industry, to conduct research that helps all Americans live longer, healthier lives. ASN is pleased that nutrition research is receiving rigorous discussion and consideration at NIH, and welcomes the opportunity to serve as a resource to NIH for nutrition research. The ASN membership has a wealth of expertise in nutrition science across the entire research spectrum from basic science to clinical practice and public health policy, from discovery to application.

Elevate nutrition research leadership, staffing, and resources supported by NIH

Transferring the ONR into the OD is a critical first step to elevating and expanding the leadership, staffing, resources, and capacities for greater cutting-edge nutrition research support across NIH. In looking at other offices within the OD, including the Office of AIDS Research, Office of Research on Women's Health, Office of Behavioral and Social Sciences Research, Office of Disease Prevention, and Office of Dietary Supplements, each of them leads and coordinates trans-NIH efforts, guided by an Office Director, and dedicated expert staff

(ranging from 15 to 30 full-time employees). The same should hold true for ONR. Furthermore, ASN urges NIH to consider the importance of adequate staff with technical expertise grounded in nutrition science for ONR. With the recent increased focus on nutrition science at the NIH, we encourage NIH to also advocate for the necessary investment to support nutrition research and to provide the NIH staff dedicated to nutrition research with the tools and resources they need to fully support these exciting new initiatives through a centrally located ONR. Dedicated support is necessary to continue to stimulate priority nutrition research across NIH and encourage NIH Institutes, Centers, and other Offices to direct or pool their funds toward common priority areas in nutrition. We hope that the ONR will also stimulate new, flexible appropriations for the OD to focus broadly on nutrition priority areas, including, but not solely, resources from the Common Fund. In addition to research strategy and harmonization, the ONR should quickly be encouraged to partner with the NIH Office of Communications and Public Liaison (OCPL) Director to develop a long-term outreach effort for dissemination of nutrition science to the public, Congress, and other stakeholders. Also following the history of other offices in the OD, the ONR should be encouraged within the first year of operation to hold a broad-based, ten-year strategic planning session that engages key stakeholders outside of NIH. Such a strategic planning session will lay out the specific needs of the ONR and the priority actions the ONR will undertake.

Achieve broad interdisciplinary support for nutrition research and allow for increased collaboration and coordination

Nutrition research creates a unifying theme across multiple NIH Institutes, Centers, and other Offices, thereby promoting the need for coordinated teamwork, collaboration, translation, and technology-sharing. Given nutrition's inherently interdisciplinary nature, ASN strongly supports the transfer of the ONR to the OD. This relocation is essential to achieving broad interdisciplinary support for nutrition research within NIH and for collaboration and coordination with other federal agencies. Such coordination is difficult from within a single institute and is best suited to the OD. The relocation gives the Director of the ONR a direct line of communication to the Director of the NIH, as well as the Directors of NIH Institutes, Centers, and other Offices. Some of the most promising nutrition-related research discoveries have been made possible by NIH support, and effective nutrition research coordination is necessary for this practice to continue. It is vital that a trans-NIH focus on nutrition research be strengthened and that central coordination be in place to ensure the success of the many critically important nutrition research programs led and supported by various NIH Institutes and Centers, including the first ever 2020-2030 Strategic Plan for NIH Nutrition Research and the new Nutrition for Precision Health, powered by the All of Us initiative.

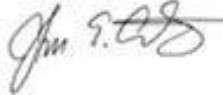
Encourage and support the next generation of nutrition researchers

Finally, given the vital nutrition research supported by the NIH, efforts to continue to recruit cutting-edge nutrition scientists to the NIH and to train the next generation of nutrition researchers are of utmost importance. Allocation of funds to the ONR for an ONR Research Scholars Program not only will provide opportunities for students to grow in their chosen field

but also provide visibility for the new office and enable the staff to mentor young scientists while they contribute to the ONR mission. The strong support of a diverse and interdisciplinary nutrition research staff with relevant skills and experience in nutrition science is necessary for a robust and successful ONR. The future of nutrition science depends on the commitment of NIH, as well as other research funding organizations, to support the nutrition research enterprise. As the agency responsible for conducting and supporting 90% of all federally funded basic and clinical nutrition research, the NIH has profound effects on nutrition research and monitoring, and the health of all Americans, as well as global communities.

ASN supports the action-oriented steps that NIH is taking to continue to advance nutrition research at the NIH and greatly appreciates the focus on and investment in nutrition research. ASN would be pleased to partner on opportunities to advance nutrition research at the NIH. Please feel free to contact me at 240-428-3643 or jcourtney@nutrition.org if ASN may provide additional information or be of assistance.

Warm regards,

A handwritten signature in dark ink, appearing to read "John E. Courtney", is positioned above the typed name.

John E. Courtney, Ph.D.
Chief Executive Officer