American Society for Nutrition
Excellence in Nutrition Research and Practice

August 5, 2024

Representative Cathy McMorris Rodgers
Chairwoman, House Energy and Commerce Committee
2188 Rayburn House Office Building
Washington, DC 20515

Representative Robert Aderholt
Chairman, Appropriations Subcommittee on Labor, Health & Human Services, and Education
266 Cannon House Office Building
Washington, DC 20515

RE: Reforming the National Institutes of Health (NIH) Framework for Discussion

Dear Chairwoman McMorris Rodgers and Chairman Aderholt,

The American Society for Nutrition (ASN) appreciates the opportunity to submit comments in response to the "Reforming the National Institutes of Health Framework for Discussion." Established in 1928, ASN is a non-profit organization dedicated to the creation, translation, and dissemination of nutrition science. ASN brings together the world's top researchers to advance the science, education, and practice of nutrition. ASN has more than 8,000 members around the world, working throughout government, clinical practice, academia, and industry, to conduct research to achieve the ASN vision of "A Healthier World Through Evidence-Based Nutrition." ASN understands the need to examine the framework and structure of the NIH, our nation's preeminent research institutions, to ensure it operates most efficiently and effectively to improve the health of all Americans.

ASN notes that the House's proposed Fiscal Year (FY) 2025 Labor-HHS appropriations bill incorporates policy to restructure the NIH. ASN strongly recommends that many opportunities for stakeholder input be included in the process to examine how best to reform the NIH before a new structure is put into place, similar to this opportunity to provide input on the "Reforming the NIH Framework for Discussion." ASN recommends that Congressional hearings and data collection support the Framework's recommendation to "Initiate and Complete a Comprehensive Review of the NIH," and that that review include the impact that restructuring the NIH will have on biomedical research prior to making any institutional changes. The consolidation of the NIH's existing 27 Institutes and Centers (I/Cs) to the proposed 15 I/Cs would affect all research conducted at the NIH and could be detrimental to the research enterprise if not done through an open, transparent process that includes input from a variety of key stakeholders along with the comprehensive review of the NIH's existing operations and research portfolios.

Similarly, a plan to consolidate and rename the existing 27 NIH I/Cs should not occur until after the comprehensive review of the NIH's existing operations and research portfolios and

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various opportunities for stakeholder input, including input from the NIH. The NIH Nutrition Research Report, 2020-2021[1], highlights 21 NIH Institutes that support nutrition research currently, along with the National Library of Medicine, National Center for Advancing Translational Sciences, Office of the Director and the Fogarty International Center – many of which are recommended to be consolidated to proposed I/Cs within the Framework. ASN believes that stakeholder input and a comprehensive review of NIH's research portfolios and existing operations will help to identify more streamlined, consolidated I/Cs that still consider the whole individual and all populations across the entire lifespan while also focusing on disease prevention and health promotion and will continue to advance the important work of many of the existing NIH I/Cs.

ASN agrees with other recommendations from the "Reforming the NIH Framework for Discussion," in particular that "Research Must Be Credible, Reliable, and Timely." NIH currently focuses many of its efforts on rewarding innovation, and while ASN also supports the Framework's recommendation that the NIH continue to "Support Innovation," which is important and necessary, that often does not allow for NIH support of systematic replication studies across research portfolios and fields. Replication studies are particularly important within the field of nutrition where the entire body of scientific evidence, including replication studies, are reviewed and synthesized to support public dietary guidance and other nutrition policies, including the *Dietary Guidelines for Americans* and the Dietary Reference Intakes.

As you work with the NIH and stakeholders to modernize the agency, it is essential to ensure that it is more transparent, flexible, and forward-thinking to address future human health challenges. ASN encourages you to prioritize the various offices which currently operate under the NIH Office of the Director, including the Office of Nutrition Research (ONR) and the Office of Dietary Supplements (ODS), to elevate their important efforts throughout any restructuring, rather than diminishing or losing their important contributions to public health. While the Framework does not specifically mention these offices, ASN is pleased to see the proposed funding increase for the NIH Office of the Director within the Framework, which would hopefully be used to continue to support these offices throughout any efforts to reform the NIH.

Nutrition is an important, highly promising, and cross-cutting interdisciplinary research area across the lifespan and both the ONR and ODS, as well as a majority of the existing NIH I/Cs, contribute to the body of nutrition research. The NIH is responsible for conducting and supporting 90% of all federally funded basic and clinical nutrition research. Some of the most promising nutrition-related research discoveries have been made possible by NIH support. Nutrition research cuts across all of the NIH's existing 27 I/Cs, as well as the proposed 15 I/Cs; however, NIH nutrition research has been historically and significantly underfunded over the

[1] https://dpcpsi.nih.gov/sites/default/files/NIH_Nutrition-Research-Report_RF508_FV-05.pdf

past decade. A 2019 NIH analysis[2] compared NIH funding for prevention research on risk factors for death and disability and concluded that large gaps exist between the top causes of poor health and the research funding allocated to address them – with the top cause being poor nutrition. Despite the pressing need for more investment in nutrition research, funding levels for nutrition research and training (as a percentage of total NIH spending) have been flat at approximately 5% since FY 2015[3]. Recently, due to inflation and other factors, support for nutrition research has actually declined, even as diet-related diseases have increased.

More than 30% of US children and teens, and 70%, or approximately 100 million US adults experience overweight or obesity that lead to many costly diet-related chronic diseases, including cardiovascular disease, cancer, and type 2 diabetes, accounting for half of the deaths in the US annually. Government spending through the federal Medicare and Medicaid programs to treat cardiovascular disease, cancer, and diabetes accounted for more than half (54%) of the $383.6 billion in health care spending, a 30% increase from 2009 to 2018.[4] Dietary behaviors are modifiable to reduce chronic disease risks. Halting, reversing and preventing chronic diseases with nutrition and diet-related efforts will provide improved cost-effective outcomes for Americans, as basic and clinical nutrition research findings are translated into impactful policies and programs that promote optimal human health. As such, ASN requests that you consider the following ways to elevate nutrition research to further support improved health and cost savings for the American public as you consider reforming the NIH:
(1) Achieve broad interdisciplinary support for nutrition research and allow for increased collaboration and coordination,
(2) Elevate NIH nutrition research leadership, staffing, and resources, and,
(3) Encourage and support the next generation of nutrition researchers.

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

Nutrition research creates a unifying theme across multiple NIH I/Cs and offices, thereby promoting the need for the Framework's recommendation to "Eliminate Silos Between I/Cs" with coordinated teamwork, collaboration, translation, and technology-sharing. Given nutrition's inherently interdisciplinary nature, it is important to achieve broad interdisciplinary support for nutrition research within NIH and for collaboration and coordination with other federal agencies. A 2021 US Government Accountability Office report[1] noted that nutrition

[2] Vargas AJ, Schully SD, Villani J, et al. 2019. Assessment of Prevention Research Measuring Leading Risk Factors and Causes of Mortality and Disability Supported by the US National Institutes of Health. JAMA Netw Open. 2(11): e1914718. doi:10.1001/jamanetworkopen.2019.14718
[3] https://dpcpsi.nih.gov/sites/default/files/NIH-Nutrition-Research-Report-Executive-Summary-508.pdf
[4] Government Accountability Office. 2021. Chronic Health Conditions: Federal Strategy Needed to Coordinate Diet Related Efforts. GAO Publication No. 21-593. Washington, D.C.: U.S. Government Printing Office. Retrieved from https://www.gao.gov/assets/gao-21-593.pdf.

currently crosses 21 federal agencies and 200 disjointed efforts. As such, it is of utmost importance that the NIH continue to effectively engage all federal agencies that support nutrition research, including the U.S. Department of Agriculture, and inform them of NIH efforts and provide opportunities for collaboration.

The NIH ONR is tasked with important collaborative roles, such as identifying research projects that deserve expanded effort and support by the NIH I/Cs, developing, leading, and managing NIH-wide nutrition research projects in collaboration with the I/Cs, and representing NIH on intradepartmental or interagency committees on nutrition research and related policy issues. Effective nutrition research coordination is necessary for nutrition-related research discoveries 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 I/Cs and offices, including the first ever 2020-2030 Strategic Plan for NIH Nutrition Research and the Nutrition for Precision Health, powered by the All of Us initiative.

Elevate nutrition research leadership, staffing, and resources supported by NIH
ASN thanks the U.S. House of Representatives for investments in the NIH in years past. Such investments are necessary to adequately support nutrition research and to provide the NIH staff dedicated to nutrition research with the tools and resources they need to fully support the exciting nutrition-related initiatives being conducted at the NIH. ASN encourages you to not reform the NIH by cutting funds that support vital research at this time. Following the reformation of the NIH likely presents the best opportunity to again review the NIH's operations and effectiveness to determine then if different funding makes sense. In particular, as you consider reforming the NIH, ASN encourages you to find ways to bolster the NIH's nutrition research staffing, resources, and capacities, which each must be increased for greater cutting-edge nutrition research support across the NIH. Dedicated support is necessary to continue to stimulate priority nutrition research across the NIH and to encourage the NIH I/Cs and offices to direct or pool their funds toward common priority areas in nutrition.

For this reason, ASN is concerned to see the loss of the NIH Common Fund in the "Reforming the NIH Framework for Discussion." The Common Fund has enabled and accelerated discoveries across numerous critical areas that positively impact public health (including food and nutrition security), economic and national security, and equity, simultaneously bolstering the nation's resilience to current and future threats. The Common Fund has supported the Nutrition for Precision Health, powered by the All of Us initiative, which is leading the way in predicting individual responses to food and dietary patterns to better help us prevent and treat diet-related diseases. The ONR and ODS are unable to issue their own grants, but should be able to draw resources from the Common Fund, given the overall lack of support for nutrition research at the NIH, to stimulate new, flexible initiatives that focus broadly on nutrition priority areas.

Encourage and support the next generation of nutrition researchers
Finally, given the vital nutrition research supported by the NIH, efforts to continue recruiting cutting-edge nutrition scientists and to train and support the next generation of nutrition researchers are of utmost importance. ASN appreciates the recommendation within the Framework to consider opportunities to continue to bolster and support more early-stage investigators. The future of nutrition science and improving the health of all Americans depends on sustained support for the entire nutrition research enterprise. One critical effort to support and encourage the next generation of nutrition researchers is to enhance support for postdoctoral researchers. The NIH supports close to 76% of postdocs in biomedical sciences in the US[5]. However, recent trends show a decline in these numbers, as many postdocs have opted for other jobs due to low salaries and unequal benefits.

Thank you for your efforts to modernize and reform the NIH. ASN looks forward to working with you to improve the effectiveness and efficiency of the NIH moving forward. Please contact Sarah Ohlhorst, MS, RD, ASN Chief Science Policy Officer (240-428-3647; sohlhorst@nutrition.org) with questions or requests for additional information related to these recommendations.

Sincerely,

Sarah Booth, PhD
2024-2025 President, American Society for Nutrition

[5] https://nexus.od.nih.gov/all/2023/03/02/number-of-postdoctoral-researchers-supported-by-nih-grant-awards-fy-2017-fy-2022/