American Society for Nutrition
Excellence in Nutrition Research and Practice

August 27, 2024

Stefan M. Pasiakos, Ph.D.
Director, Office of Dietary Supplements (ODS)
National Institutes of Health (NIH)
6705 Rockledge Drive
Bethesda, MD 20817

RE: NIH ODS Strategic Plan 2025-2029, "A Blueprint for a Coordinated Dietary Supplement Research Agenda at NIH"

Dear Dr. Pasiakos,

The American Society for Nutrition (ASN) appreciates the opportunity to provide feedback on the NIH ODS Strategic Plan 2025-2029, "A Blueprint for a Coordinated Dietary Supplement Research Agenda at NIH." 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."

Nutrition is a cross-cutting research priority at the NIH and dietary supplement research is an important part of this that allows for promising interdisciplinary research. ASN applauds the ODS Strategic Plan 2025-2029, which lays out a strong, innovative future vision for ODS and will allow for evaluation efforts that are important for building confidence and credibility. ASN appreciates the overarching goal for the strategic plan to increase the interoperability and cross-functional nature of ODS. This is particularly important as ODS does not have independent grant-making authority as an NIH Office, but rather strategizes, coordinates, and co-funds support of investigator-initiated grants with other NIH Institutes and Centers and Offices (ICOs) or other federal agencies. With this model in place for the duration of the ODS Strategic Plan 2025-2029, the coordination between ODS and other NIH ICOs, federal agencies, academic and industry researchers, and not-for-profit organizations, including professional societies like ASN, is vitally important.

As such, ASN appreciates the focus on leveraging partnerships, collaboration, and coordination across NIH, as well as with other federal agencies and experts, including ASN members. It is of utmost importance that ODS effectively engage all federal agencies that support dietary supplement research. Federal agencies that ODS plans to collaborate with during the Strategic Plan 2025-2029 period were not specified within the plan other than the inclusion of examples of previous partnerships ODS has taken part in with other federal agencies. The strategic plan should outline federal agencies and other partners that ODS plans to collaborate with in 2025-2029, particularly new partners. A valuable collaborative partnership which includes ODS

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participation is the Interagency Committee on Human Nutrition Research, which was not listed in the strategic plan. Federal agencies that ODS should continue to collaborate with include the U.S. Department of Agriculture (USDA), the Food and Drug Administration (FDA), the Centers for Disease Control and Prevention (CDC), and the Department of Defense (DOD). In particular, USDA's National Institute for Food and Agriculture's competitive grants program, the Agricultural and Food Research Initiative (AFRI), awards research, education, and extension grants to enhance human nutrition, among other priorities, and would be a great partner to ODS. ODS should maintain collaborations with these federal agency partners and others beyond NIH ICO program staff to identify research topics of interest that address knowledge gaps and align with ODS cross-cutting themes. ODS will be able to innovate and advance dietary supplement science much further through these partnerships and collaborations.

Similarly, while the plan mentions that the ODS communications team coordinates with NIH ICO communication teams and participates in broader NIH-wide communications activities, the section on communication should also highlight activities to make others, including existing and potential partners, aware of ODS and its work. Program officers at NIH ICOs and other federal agencies may be unfamiliar with ODS so communication and education activities should be extended to include these and other partners, specifically including program officers who would be able to guide Principal Investigators to the benefits of ODS co-funding.

ASN commends ODS' plan to develop best practices for basic and clinical dietary supplement research to help decrease inconsistent research methodology, endpoints, and study design strategies and promote how to increase the rigor and reproducibility of dietary supplement research, as well as self-reported dietary supplement use data. ASN encourages ODS to review the ASN publication, Valuing the Diversity of Research Methods to Advance Nutrition Science[1], as the ODS methodology program develops a harmonized set of research methods best practices that can confidently be applied to a variety of dietary supplement research projects to ensure that research methods used in ODS-funded initiatives are appropriate and rigorous. An important part of this is to ensure equitable population-based research designs and data collection tools.

ASN appreciates ODS' important efforts to promote expanded diversity, equity, inclusion, and accessibility (DEIA) in dietary supplement research and the goal to develop cutting-edge research initiatives pertaining to the cross-cutting themes of diverse populations, healthy lifespan, and resilience. Dietary supplements may be needed by certain diverse population

[1] Mattes RD, Rowe SB, Ohlhorst SD, Brown AW, Hoffman DJ, Liska DJ, Feskens EJM, Dhillon J, Tucker KL, Epstein LH, Neufeld LM, Kelley M, Fukagawa NK, Sunde RA, Zeisel SH, Basile AJ, Borth LE, Jackson E. 2022. Valuing the Diversity of Research Methods to Advance Nutrition Science. *Adv Nutr*, 13, 4, 1324-1393. Available at: https://doi.org/10.1093/advances/nmac043.

subgroups to help them achieve a healthy lifespan. For example, the Future Directions chapter of the Scientific Report of the 2020 Dietary Guidelines Advisory Committee[2] highlighted nutrients from dietary supplements and fortified foods during infancy and toddlerhood as a research need, noting research needs related to certain food components of public health concern including zinc, copper, iron, and vitamin D. This is particularly true for subgroups designated by NIH as populations with health disparities that may not have adequate access to many of the foods or dietary supplements that provide nutrients of public health concern.

While the strategic plan is very broad and encouraging, historically, funding has primarily been allocated to studies that explore just 1-2 nutrients at any given time. Since nutrients of public health concern may not always be obtained solely through the diet, fortified foods and dietary supplements may be useful in providing one or more of these nutrients. It would be encouraging for ODS research to consider leveraging food plus dietary supplements to meet nutrient needs in research studies to better understand how they work synergistically, beyond the excellent progress made in describing total nutrient intakes for both dietary supplements and food. While the strategic plan gives many examples of previous research initiatives and partnerships, it does not provide many clear examples of what is planned for 2025-2029. The many specific examples of past work are encouraging but there should be a more forward focus for a strategic plan. The plan mentions that the next priority-setting step is to schedule meetings with subject matter experts to prioritize the focus areas that will serve as the basis for new, future ODS research taking place in 2025-2029. It is unclear why this step wasn't already taken as part of the strategic planning efforts to determine ODS research initiatives for 2025 and beyond. As such, ASN would be happy to assist ODS in identifying ASN member subject matter experts to take part in these critical meetings.

ASN appreciates the mentions of biomarkers throughout the strategic plan but believes the need for more biomarker research and a better understanding of biomarkers to inform future supplementation recommendations is not given the amount of focus that it deserves, particularly within the Research and Research Capacity sections. Nutrition research including dietary bioactive components should be more explicitly mentioned and incorporated throughout the strategic plan. More research is needed on the role of nutritive and non-nutritive components, such as flavanol-based and other dietary bioactives, caffeine, pre/probiotics, botanicals, and various forms of fiber offered as dietary supplements, in health and disease prevention.

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[2]Dietary Guidelines Advisory Committee: 2020. Scientific Report of the 2020 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Agriculture and the Secretary of Health and Human Services. U.S. Department of Agriculture, Agricultural Research Service, Washington, DC. Available at: https://doi.org/10.52570/DGAC2020.

Thank you again for the opportunity to provide feedback. ASN is pleased that ODS is leading the way for innovative dietary supplement science and research to be conducted, and welcomes the opportunity to serve as a resource to ODS during implementation of the NIH ODS Strategic Plan 2025-2029. Please contact Sarah Ohlhorst, MS, RD, ASN Chief Science Policy Officer (sohlhorst@nutrition.org; 240-428-3647) with questions or requests for additional information related to these recommendations.

Sincerely,

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