

Submitted via DPCPSIreorgcomments@nih.gov

Dr. James Anderson
Director, Division of Program Coordination, Planning and Strategic Initiatives
National Institutes of Health

Dear Dr. Anderson,

Thank you for the invitation to comment on the proposed transfer of the Office of Nutrition Research (ONR) into the National Institutes of Health (NIH) Office of the Director, the central entity for setting NIH policy and planning and for managing and coordinating NIH programs and activities.

We strongly support this transfer, as DPCPSI is the central entity for setting NIH policy and planning and for managing and coordinating NIH programs and activities, and this proposed transfer will be essential to create the expanded coordination, leadership, staffing, and resources necessary to facilitate greater cutting-edge nutrition research across NIH and with other federal agencies involved in nutrition research. Poor nutrition is challenging almost every aspect of our society, contributing to poor health, health disparities, and preventable healthcare spending. Nutrition research is currently dispersed throughout NIH, and multiple cross-cutting research gaps need to be addressed in concert across the NIH Institutes. Greater federal coordination and investment in nutrition research could accelerate discoveries across numerous critical areas and positively impact public health, equity, the economy, national security, and the nation's resilience to new threats.

As described in our white paper, [Strengthening national nutrition research: Rationale and options for a new coordinated federal research effort and authority](#), the transfer of the ONR into the NIH Office of the Director will have many benefits for advancing nutrition science. This includes providing a stronger platform and capacities to:

- Re-establish close communication and coordination with the NIH Director, other divisions and offices within the NIH Office of the Director, and the nutrition activities across all the NIH institutes and centers
- Ensure successful implementation of the [2020-2030 Strategic Plan for NIH Nutrition Research](#) and [NIH Common Fund Precision Nutrition Initiative](#)
- Build and coordinate new and enhanced collaborative relationships and synergies within the NIH, with other federal departments and agencies (e.g., USDA, CDC, FDA, CMS, DOD, VA, etc.), and with external stakeholders including public-private partnerships to drive nutrition research and innovation
- Provide guidance on rigorous research methodology
- Offer trainings to build the next generation of scientists capable of addressing diet-related diseases and health disparities
- Enhance approaches and resources to support analyses and reporting of the NIH nutrition research portfolio
- Increase the impact, visibility, and dissemination of nutrition science findings including through efforts of new and enhanced communications specialists
- Structure a more formalized approach to engage strong external advisory mechanisms and strengthen input from other federal departments and agencies, academic institutions, advocacy groups, state and local governments, community members, and other stakeholders

We believe it is crucial that the new Director of the NIH ONR be a highly respected scholar from the research community, and serve as the NIH Associate Director for Nutrition Research, similar to the NIH Office of Disease Prevention Director who also serves as the NIH Associate Director for Prevention ([P.L. 99-158](#)).

We recommend that staffing and resources for this new Office be sufficient to hire numerous mid and senior level scientific staff and communications specialists, and that the Office should also have enough resources to fund new areas of research similar to the Office of Behavioral and Social Sciences Research (OBSSR) or Office of Dietary Supplements (ODS).

A [recent NIH analysis](#) evaluated the leading risk factors and causes of death and disability in the United States, compared with NIH funding on these factors, and concluded that large mismatches exist between the top causes of poor health versus research funding to address them, with the largest gap being for nutrition. The transfer of the ONR into the NIH Office of the Director is a critical step to elevate the coordination, leadership, staffing, resources, and capacities for critical nutrition research within and outside NIH.

We appreciate your consideration of our comments, and thank you for your service.

Sincerely,

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