



Email sent on June 4, 2014 to USglobalnutrition@hhs.gov

Dear Technical Working Group on the US Government Global Nutrition Coordination Plan:

The American Society for Nutrition (ASN) appreciates the opportunity to provide comment on the draft outline and framework for the proposed US Government Global Nutrition Coordination Plan. ASN applauds the US Government for taking leadership in developing a coordinated, interagency approach to global nutrition efforts in order to maximize US government global investments towards your commitment to the prevention of non-communicable diseases through nutrition knowledge and evidence. ASN encourages the US Government to continue to pursue interagency partnerships focused on domestic nutrition as well, to ensure that all federal agencies are a unified front against nutrition, food, and agricultural challenges. Malnutrition, nutrient deficiencies, obesity and non-communicable diseases are very important and complex issues that require multidimensional, feasible, and sustainable solutions. Further, ASN supports access to an affordable, nutritious, and diverse diet for all. ASN is dedicated to bringing together the world's top researchers to advance our knowledge and application of nutrition. With more than 5,000 members in over 90 countries who work in academia, practice, government and industry, a Global Nutrition Council, and partnerships with nutrition societies in numerous other countries, ASN has access to a wide variety of global nutrition experts who can be instrumental in helping to ensure that other nutrition efforts are aligned with the US Government coordination plan. As you consider the need for expertise on nutrition science across the life cycle, particularly as it relates to under- and over-nutrition, we offer our Society as a resource to you.

- ***Is the “Purpose” appropriate for the U.S. government? Does it reflect the roles of the diverse U.S. government agencies involved in global nutrition?***

ASN believes that the purpose is appropriate and reflects the roles of the diverse US Government agencies involved in global nutrition. ASN suggests that an important purpose of the coordination plan should be to link the US Government's nutrition efforts domestically and globally whenever possible. Another important purpose that will lead to improved nutrition is achieving behavior change through education efforts. Once improved nutrition is achieved, it will not only enhance global health, productivity, and human potential, but will also positively influence global economies, which may also be considered for inclusion in the purpose. We share the ASN Nutrition Research Priorities (www.nutrition.org/resarchagenda) as a possible resource to the US Government while the coordination plan is finalized¹.

¹ Ohlhorst S, Russell R, Bier D, Klurfeld DM, et al. Nutrition research to affect food and a healthy life span. *Am J Clin Nutr* 2013;98:620–625. doi: 10.3945/ajcn.113.067744

- Is the “Expected Result” clear and achievable?***

While the Expected Result is clear, it is broadly defined and may be challenging to measure progress and success. ASN suggests the inclusion of an achievable set of goals that build upon the expected result, as well as monitoring and evaluation activities and success criteria that will be used to show progress towards the goals and end result. ASN hopes that the coordination plan will make clear how better coordination of US Government will lead to accelerated progress toward relevant World Health Assembly targets and other US Government global nutrition commitments. While the World Health Assembly (WHA) targets are highly important, ASN hopes that the coordination plan will elaborate on “other US Government global commitments.” There are other highly important efforts and targets not covered by the WHA targets, which the US Government coordination plan should address: universal access to safe drinking water; micronutrient supplementation/ food fortification and enrichment; reduced food waste and improved food safety and sanitation; reduction of childhood anemia; nutritional and health status of the growing population of older adults; reduction of maternal under- and over-nutrition; and consumer education initiatives.
- Are the three “Action Areas” clearly stated? Do they encompass the activities that are needed to achieve the “Expected Result”?***

The Action Areas are clearly stated. ASN hopes that the coordination plan will also make note of how other stakeholders will be involved in the Action Areas. Strengthened US Government coordination is necessary, but to truly achieve the expected result, ASN believes it is essential to include the participation and input from additional key stakeholders, from both the public and private sector, to accelerate the US Government’s efforts. Collaboration between all stakeholders is paramount to create and implement effective science-based nutrition education, policies, and programs in order to ensure improved health.
- What should be the relative weight or proportion of effort for each of the “Action Areas”? Please comment on the relative priority each should be given in this comprehensive Coordination Plan.***

ASN believes that the most weight should be given to Action Area #3: Generate, Share, and Apply Knowledge and Evidence. As an organization devoted to advancing the knowledge and application of nutrition to improve human and animal health, ASN strongly supports nutrition-focused recommendations, policies, and programs grounded in evidence-based science that may emanate from the US Government’s global nutrition efforts. Action Area #3 includes highly important in-country education efforts and lends itself to the other two action areas. Action Area #3 helps to support and advance actions around the other two areas: the sharing and generation of nutrition knowledge and evidence is an excellent way to promote partnerships, as well as to support Country-led efforts.

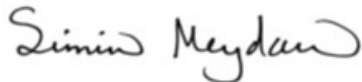
While supporting Country-led efforts is indeed necessary and useful, ASN believes that partnerships leading to coordinated nutrition efforts, not only among the various US Government agencies but also among the US and other countries, will more quickly result in health gains. For this reason, ASN suggests that the US Government give more weight to Action Area #2: Promote Leadership and Partnership, rather than Action Area #1: Support Country-led efforts.

- ***Does the proposed Coordination Plan outline include all of the important facets necessary in a whole-of-government plan to improve coordinated actions among U.S. agencies for the complex, multi-sectoral area of global nutrition? If not, what is missing?***

ASN appreciates the life cycle approach that is incorporated into the proposed outline and the fact that older adults are included in this effort, as well as children and other subpopulations. ASN recommends that the section on “Background of Global Nutrition” include information on the regions of the world/ countries that the US Government currently focuses nutrition efforts in, as well as the US Governments’ current global nutrition investments, including global research, education, and policy/intervention efforts. ASN recommends that the section on “Present US Mandates, Roles and Partners” include not only the Functions and Roles of Departments/Agencies, but also the lead and supporting agencies on existing global nutrition efforts.

Thank you for providing the opportunity to comment on the US Government Global Nutrition Coordination Plan framework and outline. ASN looks forward to the opportunity to assist with further review of the plan, and suggests that an additional public comment period on the final Coordination Plan be initiated to allow stakeholders to comment on additional, more detailed information. Please feel free to contact Sarah Ohlhorst, MS, RD, ASN’s Director of Government Relations, at 301.634.7281 or sohlhorst@nutrition.org if ASN may provide further assistance.

Sincerely,



Simin N. Meydani, D.V.M., Ph.D.
ASN President, 2014-2015