



American Society for Nutrition
Excellence in Nutrition Research and Practice

June 24, 2015

National Institutes of Health
Division of Nutrition Research Coordination
Two Democracy Plaza, Room 635
6707 Democracy Boulevard--MSC 5461
Bethesda, Maryland 20892-5461

Re: ASN Comments on the National Nutrition Research Roadmap 2015-2020:
Advancing Nutrition Research To Improve and Sustain Health

Dear members of the Interagency Committee on Human Nutrition Research (ICHNR):

The American Society for Nutrition (ASN) appreciates the opportunity to comment on the draft National Nutrition Research Roadmap 2015-2020: Advancing Nutrition Research to Improve and Sustain Health (referred to as the roadmap from here on out). As the 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 a vested interest in nutrition research to improve and sustain health. ASN has more than 5,000 members in the United States and around the world, working throughout government, clinical practice, academia and industry, to conduct nutrition research that helps all individuals live healthier lives.

ASN applauds the interagency effort to foster a coordinated approach to address nutrition research and improve the nutrition science workforce. In fact, one of ASN's priority policy areas for 2015-2016 is to "Promote improved coordination of nutrition programs and research across all federal agencies". ASN recognizes that effective nutrition research coordination is necessary to allow promising nutrition-related research discoveries to continue to be made. Given nutrition's inherently interdisciplinary nature, an ongoing, strong coordinating mechanism across all government agencies is essential to grasp the many promising opportunities via truly interdisciplinary nutrition research.

ASN is discouraged that the need for continuous nutrition research funding, as well as the current status of federal funding for nutrition research, are absent from the roadmap. Funding, or a lack thereof, has profound effects on basic and clinical nutrition research and nutrition monitoring and therefore, the health of all Americans. A continued commitment to fund translational research in nutrition is needed to develop effective nutrition practice and policy. A renewed commitment to fund basic science research in nutrition is essential to grow our fundamental knowledge of nutrition that will be translated into public health benefits. The roadmap covers workforce readiness, but fails to recognize that without adequate funding it will be impossible to prepare future generations to advance nutritional sciences research. Resources are required to reap the public health benefits associated with the Key Research Priorities for 2015-2020. There

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is no mention of potential means to address the short- and long-term initiatives listed under each question. Unless there are specific and focused Funding Opportunity Announcements (FOAs) and a commitment from each of the agencies who comprise the ICHNR to set aside funds to address the Key Research Priorities for 2015-2020, then progress cannot be made. ASN encourages the ICHNR to note the importance of continuous funding for nutrition research in the roadmap, both as a current resource need and a future funding opportunity.

Also of concern to ASN is that global nutrition research is largely absent from the roadmap. ASN recognizes that this is a national roadmap, yet global nutrition research findings are essential to help advance nutrition research and public health gains within the U.S. For example, global nutrition research focused on malnutrition can enhance our ability to treat malnutrition in vulnerable, clinical populations both in the U.S. and abroad by allowing a better understanding of the causes and consequences of malnutrition, as well as malnutrition's interaction with infectious disease. The roadmap should note the U.S. federal government's commitment to advance global nutrition research, as evidenced by the U.S. Government Global Nutrition Coordination Plan, and provide specific examples of global nutrition research priorities.

Throughout the roadmap, a Mediterranean style diet is mentioned as a healthy eating pattern. ASN suggests that the ICHNR not single out specific diets or diet styles, but refer to food patterns generally, as specific examples may not be relevant or relatable dependent on culture, ethnicity, heritage, etc. As noted under Question 2, cultural/ethnic beliefs and practices and socioeconomic status, along with many other demographic, behavioral, lifestyle, social, and environmental factors influence food choice, and therefore food preparation, food consumption, etc. It would be useful for the ICHNR to define parameters of what constitutes a healthy eating pattern in terms of health promotion and disease risk rather than focusing on a specific approach. In this way, healthy dietary patterns can be customizable to cultural and ethnic preferences, socioeconomic status, and other factors that influence food choice. (ASN also encourages the ICHNR to further define any dietary patterns or diet styles referenced if they remain as examples in the document).

ASN comments specific to certain sections of the roadmap are included below under each section title, as relevant. ASN did not have comments specific to any sections not listed.

Introduction

ASN reviewers felt that the introduction could be expanded to include important topics that are thoroughly covered within the actual roadmap, but have not been discussed in the introduction, such as health disparities. This will also further differentiate the introduction from the executive summary, as parts of these sections are approximately identical.

National Nutrition Research Roadmap

ASN is encouraged to see that many of the nutrition research priorities and gaps delineated in ASN's Nutrition Research Priorities (1) are also found in the National Nutrition Research Roadmap. The roadmap could be made even more helpful for nutrition researchers and others if the "Key Research Priorities for 2015-2020" were prioritized. It would be useful to list the short-term and long-term initiatives under each Topic in a priority order to show which initiatives the ICHNR deems to have the most potential, as well as the greatest need.

ASN notes the need for more research studies with clinically meaningful outcomes to help advance our understanding of the role of nutrition, particularly in the areas of immunity and infection, but for other areas of the roadmap as well. Observational and epidemiological data are highlighted in the roadmap, but properly designed clinical trials and basic, clinical research studies are equally important and necessary to help solve nutrition-related challenges. There are few places in the roadmap that mention the importance of basic sciences in nutrition, as well as mechanistic studies, which ASN considers an oversight. Basic science appears to have the best fit under Question 3.

ASN would like to see more emphasis on dissemination and implementation (D&I) as a research focus so that funding can be aligned with D&I science research approaches. While discovery is highlighted within the roadmap, the importance of implementing successful nutrition research discoveries into broader applications using rigorous approaches could be further accentuated.

Also, while the ICHNR definition of human nutrition research includes nutrition education, the importance of nutrition education to facilitate behavior change is not covered adequately in the roadmap. Research into individual/community education for translation and scaling up of nutrition research findings should be an important component to the roadmap.

ASN would also like to see an emphasis within the roadmap on best practices for scientific research conducted in nutrition and how confounders in nutrition, such as dietary assessment techniques, that are not present in pharmaceutical and medical-focused research should be taken into account.

Key Research Priorities for 2015-2020

Question 1. How can we better understand and define eating patterns to improve and sustain health?

- Topic 1 (Q1T1). How do we enhance our understanding of the role of nutrition in health promotion and disease prevention and treatment?

This section appears to emphasize prevention more than treatment, although T1Q1 pertains to both disease prevention and treatment. ASN's Nutrition Research Priorities include "The Role of Nutrition in Medical Management" and recognizes the key role of nutrition in optimal patient care and effective disease management. The roadmap should emphasize the important role of medical nutrition therapy within this section, along with the role of nutrition in health promotion and disease prevention.

- Topic 3 (Q1T3). How do we enhance population-level food and nutrition-related health monitoring systems and their integration with other data systems to increase our ability to evaluate change in the food supply, composition, consumption, and health status?

ASN notes two important tools currently in development that help to address the research needs noted under this Topic question. The Branded Foods Database, of which ASN is a supporter, will augment the US Department of Agriculture (USDA) National Nutrient Database with current and historical composition data on branded and private label food products. A public-private partnership consisting of USDA's Agricultural Research Service, the International Life Sciences Institute-North America, and the Agricultural Technology Innovation Partnership (ATIP) Foundation currently manages the Branded Foods Database, which is moving into the implementation phase. The database will enable nutrition scientists and others for the first time to more accurately track trends in the food supply and the food selection and nutrient intakes of Americans. Secondly, a lower-cost alternative to multiple 24-hour dietary recalls has recently been validated. A web-based Automated, Self-Administered 24-hour dietary recall (ASA24) was shown to be a low-cost method to collect accurate dietary intake information (2). Therefore, discussion of these tools within the roadmap will facilitate cost-effective research strategies.

Workforce Readiness for Advancing Nutritional Sciences Research

ASN is discouraged that the recruitment, training, and continued support of underrepresented groups is not included within the "Workforce Readiness for Advancing Nutritional Sciences Research" section of the roadmap and urges that this be included.

Interagency Collaboration and Public-Private Partnerships to Advance Nutritional Sciences Research

ASN is pleased to see mention of public-private partnerships as an effective way to advance nutritional sciences research. ASN and others, including individuals representing various federal agencies that support and conduct nutrition research, recently developed principles to guide the establishment and operation of successful research public-private partnerships (3), which can serve as a useful model as more public-private partnerships are undertaken as a means to efficiently and effectively conduct nutrition research.

Thank you for the opportunity to contribute ASN's comments to help shape the National Nutrition Research Roadmap. ASN and its members look forward to federal government Requests for Applications that focus on the short-term and long-term initiatives listed under the Key Research Priorities for 2015-2020 within the roadmap. Please contact Sarah Ohlhorst, ASN Director of Government Relations, to discuss ASN's comments further. She can be reached at 301.634.7281 or sohlhorst@nutrition.org.

Sincerely,



Patrick Stover, Ph.D.
2015-2016 President, American Society for Nutrition

References

1. Ohlhorst S, Russell R, Bier D, et al. Nutrition research to affect food and a healthy life span. [Am J Clin Nutr 2013;98: 620-625.](#)
2. Thompson FE, Dixit-Joshi S, Potischman N, et al. Comparison of Interviewer-Administered and Automated Self-Administered 24-Hour Dietary Recalls in 3 Diverse Integrated Health Systems. *Am J Epidemiol*. First published online May 10, 2015.
3. Alexander N, Rowe S, Brackett RE, et al. Achieving a transparent, actionable framework for public-private partnerships for food and nutrition research. [Am J Clin Nutr 2015;101:1-5.](#)