



American Society for Nutrition
Excellence in Nutrition Research and Practice

March 12, 2012

National Institute of Food and Agriculture
U.S. Department of Agriculture
STOP 2240
1400 Independence Avenue, SW
Washington, DC 20250-2240

Re: NIFA-2012-0004 Solicitation of Input from Stakeholders Regarding the Agriculture and Food Research Initiative (AFRI) for FY 2013 77 *Federal Register* 21 (February 1, 2012)

To Whom it May Concern:

The American Society for Nutrition (ASN) appreciates the opportunity to submit comments on the Agriculture and Food Research Initiative (AFRI) for consideration in development of the Fiscal Year (FY) 2013 AFRI program solicitations and the FY 2014 Budget. Founded in 1928, ASN is a nonprofit scientific society with more than 4,400 members in academia, clinical practice, government and industry. Our members have been actively involved in the USDA competitive grants program both as recipients of such grants and by serving on grant review panels.

ASN continues to be a strong supporter of AFRI, which funds cutting-edge, agricultural research on key issues of timely importance to the American public on a competitive, peer-reviewed basis, since its establishment in the 2008 Farm Bill. ASN is extremely appreciative of AFRI's support for human nutrition research and for being responsive to stakeholder input derived from previous listening sessions, including an update from then National Institute of Food and Agriculture (NIFA) Director Roger Beachy during ASN's 2010 Scientific Sessions and Annual Meeting. ASN strongly believes that greater investment in basic and applied agricultural research with a translational focus is essential to provide a safe and nutritious food supply, and is fully supportive of the President's FY 2013 proposed budget of \$325 million for AFRI.

ASN believes research that informs our understanding and implementation of health promoting-lifestyles and dietary practices to optimize human health and prevent chronic diseases, such as cancer, diabetes, and heart disease, should remain a priority at USDA. The U.S. must maintain and enhance the potential for future scientific breakthroughs in many areas of nutrition; therefore, ASN encourages USDA to provide adequate grant funding for a diverse portfolio of human nutrition research that will lead to future health advances, improved nutrition and better quality of life, in addition to focusing on our most immediate public health concerns. *ASN encourages USDA to not be too narrow when describing challenge areas, which will limit the focus of USDA-funded nutrition research, as well as the potential for novel ideas and discoveries.*

This includes making AFRI funding available for important nutrition research topics that provide the basis for solutions to larger health-related issues, allowing individuals to live healthier and to lead more productive lives. An ASN Working Group has identified specific areas that merit additional agricultural-related research, including:

- The use of a systems approach to better understand the complexities of achieving and maintaining energy balance
- The drivers underlying individual food choices and how they can be modified to positively impact health
- Approaches to adequately collect and assess accurate food composition and intake data, which then can be linked to health outcome data
- The ranges of Dietary Reference Intakes that are consistent with maintaining stable, constant conditions for optimum health in all population subgroups
- The adverse impacts of elevated intakes of nutrients and other food components on disease progression and overall health.

ASN encourages the USDA to continue to place a strong emphasis on investigator-initiated research, which has been a successful model for the nation's agricultural research enterprise. ASN supports maintaining an emphasis on integrated programs and multidisciplinary teams, while also providing funding for investigator-initiated applied and basic research on the application of state-of-the science approaches to define the biological functions of nutrients and their role in preventing disease and maintaining health across the lifespan. Long-term, investigator-initiated research, which is often foundational, provides many benefits that cannot always be achieved with shorter term research.

ASN applauds USDA-funded nutrition research, as a large proportion of AFRI grant support is used to prepare the next generation of nutrition scientists by ensuring that training and careers are sustained for years to come. ASN supports NIFA considering ways to expand education and training opportunities, such as for first-time or young investigator AFRI grant applicants. ASN believes it is reasonable to require that a portion of AFRI grant budgets be used to support pre-doctoral or post-doctoral trainees.

Thank you for the opportunity to submit comments on the Agriculture and Food Research Initiative (AFRI) for consideration in development of the Fiscal Year (FY) 2013 AFRI program solicitations and the FY 2014 Budget. The American Society for Nutrition (ASN) looks forward to working with the Agency to further enhance AFRI program solicitations. Please contact Sarah Ohlhorst, M.S., R.D., Director of Government Relations, if ASN may provide further assistance. She can be reached at 301.634.7281 or sohlhorst@nutrition.org.

Sincerely,



Sharon M. Donovan, Ph.D., R.D.
President, American Society for Nutrition