



American Society for Nutrition  
*Excellence in Nutrition Research and Practice*

March 3, 2015

Paul M. Coates, Ph.D.  
Director, Office of Dietary Supplements  
National Institutes of Health  
6100 Executive Blvd., Room 3B01  
Bethesda, MD 20892-7517

Re: Office of Dietary Supplements Strategic Plan 2010-2014 Progress Report

Dear Dr. Coates:

The American Society for Nutrition (ASN), under the auspices of its Public Policy Committee, appreciates the opportunity to comment on the Office of Dietary Supplements (ODS) Strategic Plan 2010-2014 Progress Report. ASN is the premier not-for-profit, professional scientific society dedicated to bringing together the world's top researchers to advance our knowledge and application of nutrition. Founded in 1928, ASN has more than 5,100 members in the United States and around the world, working throughout government, clinical practice, academia and industry to conduct, apply, and disseminate research that helps all individuals live longer, healthier lives.

ASN commends the ODS for its leadership and progress, even in fiscally challenging times, to advance promotion of science to inform public health policy and to help consumers make informed decisions about their health care. For example, ODS' support for the development of tools for dietary supplement research, including the Analytical Methods and Reference Materials Program, its database programs, and its evidence-review programs, have consistently filled critical needs for the nutrition research community and other stakeholders. The newer Vitamin D initiative is addressing gaps in understanding of vitamin D measurement and status that would otherwise continue to lag. Its research and training support has assured that nutrition science is included in assessment of botanicals and their potential health effects. Achievement of its goals through extensive collaboration provides a model for advancing nutrition science. And its outreach, especially through the website, is a valuable resource for researchers and consumers.

With regard to the Progress Report, ASN applauds its clarity and comprehensiveness as a framework for next ODS Strategic Plan. More specific comments on the plan are attached for consideration.

Thank you for the opportunity to comment on the ODS Progress Report. We look forward to the Strategic Plan. 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](mailto:sohlhorst@nutrition.org).

Sincerely,

Simin N. Meydani, D.V.M., Ph.D.  
2014-2015 President, American Society for Nutrition

Attachment

## **Response from ASN to Questions about the Strategic Plan 2010-2014 Progress Report**

### **Is ODS meeting its stakeholders' needs?**

The nutrition research community has benefitted greatly from the outstanding work of the ODS and urges continuation and enhancement of the ODS strong program of activities. ODS may wish to consider describing in the Strategic Plan how it is meeting specific stakeholder needs.

### **Are current strategic goals adequate? Should any be modified? Are any new ones needed?**

The ODS goals as outlined on page 3 are comprehensive and address important research and communication needs. They are consistent with the ASN's six Nutrition Research Priorities and its accompanying *Tools to Advance Nutrition Research* ([www.nutrition.org/researchagenda](http://www.nutrition.org/researchagenda)).

### **In the future should any of the ODS' current program or activities be given high (or lower) priorities?**

- The ODS portfolio addresses important needs of the research community, especially its support for research and training, programs focused on specific nutrition and intervention and research tools. Its collaborations with other federal agencies and communications programs also meet critical needs. The analytical methods and reference materials program, dietary supplement databases, and evidence-base review program are particularly important to researchers working in the area of dietary supplements.
- B.1. Vitamin D Initiative. The Vitamin D Initiative is clearly filling an important gap on a number of counts. For example there is need for more clarity regarding clinical outcomes associated with 25(OH)D levels. Some randomized controlled trials (RCT) still use it as an outcome rather than a measure of exposure. The inconsistent reports from association studies are confusing and call for additional research in the area. As the conference convened by ODS also indicated, inconsistency with regard to optimal levels of 25(OH)D and dietary intakes needed to achieve those levels makes it difficult for health care providers to know when to test and how to interpret results and also calls for further research. The conference convened by ODS represented important progress, and efforts need to continue.
- Although the Vitamin D Initiative is a priority, the Progress Report lacked sufficient explanation of the reasons for identifying it as a priority within the ODS portfolio. Thus ODS may wish to strengthen its rationale in the Strategic Plan.
- B5. Nutrition and Dietary Supplement Interventions for Inborn Errors of Metabolism historically is a priority within nutrition research and practice. ODS' progress is encouraging. Lacking in the report was an explanation of future activities for that priority.

### **How can ODS more effectively provide useful information to the ODS user community, including consumers, investigators, practitioners, industry, media, policy makers, government, and other interested parties?**

The ODS website is excellent and a resource to researchers and consumers. ODS is encouraged to assure that materials are updated regularly, perhaps yearly.