

March 1, 2012

Alan E. Guttmacher, M.D., Director Yvonne Maddox, Ph.D., Deputy Director Eunice Kennedy Shriver National Institute of Child Health and Human Development (NICHD) National Institutes of Health 31 Center Drive Building 31, Room 2A32, MSC 2425 Bethesda, MD 20892-2425

Re: Proposed Eunice Kennedy Shriver National Institute of Child Health and Human Development (NICHD) Reorganization

Dear Drs. Guttmacher and Maddox:

The American Society for Nutrition (ASN) appreciates the opportunity to submit comments to the National Institutes of Health (NIH) Eunice Kennedy Shriver National Institute of Child Health and Human Development (NICHD) Office of the Director regarding the proposed NICHD reorganization. ASN is a 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 more than 4,400 members in the United States and around the world, working throughout government, clinical practice, academia and industry, to conduct research that helps all Americans to live longer, healthier and more productive lives.

Although ASN supports many of the major proposed changes in the Institute's reorganization plan, of utmost concern to ASN is that the word nutrition will be dropped from the Endocrinology, *Nutrition*, and Growth Branch title of the NICHD Center for Research for Mothers and Children (which will be abolished) to become the Growth and Metabolism Branch. ASN agrees with NICHD that nutrition is an important, crosscutting research priority that allows many promising opportunities for interdisciplinary research. However, a lack of the term nutrition from *all* NICHD Office, Division, Center, and Branch titles does not clearly convey the importance of nutrition research at NICHD to the external research community and therefore will not be considered a prominent area of scientific pursuit at NICHD. **Nutrition research proposals related to Child Health and Human Development may be sent to other NIH Institutes/ Centers or other Federal Agencies in the future, or worse, not funded at all.**

As the agency responsible for conducting and supporting 90% of all federally-funded basic and clinical nutrition research, the NIH has profound effects on nutrition research and monitoring and the health of all Americans. A strong advocate for NIH funding, ASN recognizes that some of the most promising nutrition-related research discoveries

have been made possible by NIH support and would like for this practice to continue in all NIH Institutes/ Centers, including NICHD. It is vital that the critically important nutrition research and programs led by the Endocrinology, Nutrition, and Growth Branch, which support many NIH Institutes/ Centers and the NIH goals of health promotion and disease prevention, continue. Research gaps in the areas of Child Health and Human Development require additional research that is not as relevant to other NIH Institutes/ Centers, such as:

- The development of biomarkers to improve how we monitor nutritional status of infants and children, of which little is known;
- How nutritional events during pre-conceptual and conceptual periods may contribute to the origins of later disease;
- The optimal nutritional management of pre-term infants to support survival, optimal growth and development;
- The short-term and long-term impacts of maternal/child nutrition on normal growth and development.

Furthermore, these important research areas can only be addressed by staff with technical expertise grounded in nutrition science. It is important that NICHD acknowledge the vital nutrition research being conducted central to the Institute to continue to recruit cutting-edge nutrition researchers to their staff. NICHD can only provide the best opportunities and support to the research community by having resident expertise in nutrition science and ASN fears that this could also be lost with the proposed loss of nutrition in NICHD organization titles. As a researcher with a focus and expertise in pediatric nutrition who receives long-term, current funding from NICHD, I can attest to the impact that nutrition research funded by NICHD has to the health and wellbeing of infants and children worldwide.

Thank you for the opportunity to submit comments to the NICHD Office of the Director regarding the proposed reorganization. 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.

Chalun M. Alousvan

President, American Society for Nutrition

Professor of Nutrition and Pediatrics, University of Illinois, Urbana

Cc: Francis Collins, M.D., Ph.D., Director, National Institutes of Health Secretary Kathleen Sebelius, U.S. Department of Health and Human Services