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December 28, 2020

Dr. James Anderson  
Director, Division of Program Coordination, Planning and Strategic Initiatives  
National Institutes of Health

Dear Dr. Anderson,

On behalf of Oldways, a 501(c)3 educational nonprofit dedicated to inspiring people to embrace the healthy and sustainable joys of the old ways of eating, we are writing in support of the proposed transfer of the Office of Nutrition Research (ONR) into the National Institutes of Health (NIH) Office of the Director.

The NIH's own analyses reveal a critical need to elevate the resources and capacities for nutrition research. An NIH study published in *JAMA Network Open* evaluating the leading risk factors for death and disability in the United States, compared with NIH funding on these factors, found that large mismatches exist between the top causes of poor health versus research funding to address them, with the largest gap being for diet<sup>1</sup>. Greater federal coordination and investment in nutrition research could accelerate discoveries across numerous critical areas and positively impact public health and health equity, along with the economy and national security.

As Dr. Dariush Mozaffarian and esteemed colleagues have noted elsewhere:

The transfer of the ONR into the NIH Office of the Director will help ensure successful implementation of the 2020-2030 Strategic Plan for NIH Nutrition Research and NIH Common Fund Precision Nutrition Initiative. In addition, this transfer can help build and coordinate new and enhanced collaborative relationships and synergies within the NIH, with other federal departments and agencies, and with external stakeholders including public-private partnerships to drive nutrition research and innovation. The transfer will also provide the ONR with a stronger platform and capacities to provide guidance on rigorous research methodology; offer trainings to build the next generation of scientists capable of addressing diet-related diseases and health disparities; and enhance approaches and resources to support analyses and reporting of the NIH nutrition research portfolio.

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<sup>1</sup> Vargas AJ, Schully SD, Villani J, Ganoza Caballero L, Murray DM. Assessment of Prevention Research Measuring Leading Risk Factors and Causes of Mortality and Disability Supported by the US National Institutes of Health. *JAMA Netw Open*. 2019;2(11):e1914718. doi:10.1001/jamanetworkopen.2019.14718



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The Director of the NIH ONR can also serve as the NIH Associate Director for Nutrition Research, similar to the NIH Office of Disease Prevention Director who also serves as the NIH Associate Director for Prevention (P.L. 99–158). In addition to research strategy and harmonization, the Office Director and new and enhanced staff (including communications specialists, present in other similar NIH Office of the Director Offices) should increase capacity and expertise for dissemination and visibility of nutrition science to the public and other stakeholders.

We thank the NIH for the opportunity to share our expertise on the proposed transfer, and we look forward to learning more about how we can best support strengthening nutrition research across the country.

Sincerely,

**Kelly Toups**

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