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Re: CRN Comments on Draft ODS Strategic Plan 2022-2026

On behalf of the Council for Responsible Nutrition (CRN),¹ we are pleased to submit these comments in response to the ODS Five-Year Strategic Plan for 2022-2026.

Are there emerging public health issues that ODS can help address?

- We recognize ODS's efforts to create the "Dietary Supplements in the Time of COVID-19" fact sheets and update these sheets as new research emerges. We encourage ODS to continue regularly updating the fact sheets when new information becomes available. For vitamin D, in particular, we are aware of numerous studies that have been conducted since the beginning of the pandemic, or are currently in progress, that demonstrate a relationship between higher vitamin D levels and a lower incidence or severity of COVID-19. CRN has been closely monitoring this research on vitamin D and COVID-19 for the CRN Foundation's educational campaign, [Vitamin D & Me!](#). We strongly encourage ODS to include these new research findings in its education.

Are there existing knowledge gaps that ODS can help address (not included in the current plan)?

- Although mentioned briefly in the draft strategic plan, dietary supplement use and its contribution to meeting the unique nutrient needs in lactating women is under-researched. ODS could conduct or support research in this area, and also educate consumers and healthcare

¹ **The Council for Responsible Nutrition (CRN)**, founded in 1973, is a Washington, D.C.-based trade association representing 180+ dietary supplement and functional food manufacturers, ingredient suppliers, and companies providing services to those manufacturers and suppliers. In addition to complying with a host of federal and state regulations governing dietary supplements and food in the areas of manufacturing, marketing, quality control and safety, our manufacturer and supplier members also agree to adhere to additional voluntary guidelines as well as to CRN's Code of Ethics. Visit www.crnusa.org. Follow us on Twitter [@CRN_Supplements](https://twitter.com/CRN_Supplements) and [LinkedIn](https://www.linkedin.com/company/crnusa).

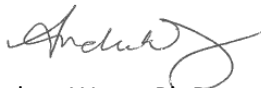
providers on the different nutritional requirements during the post-partum period compared to during pregnancy. The recent [Dietary Guidelines for Americans 2020-2025](#), issued jointly by the U.S. Department of Agriculture and U.S. Department of Health and Human Services, identifies some of these differences. Consumers and healthcare providers could be guided to look for appropriate supplements to address these requirements.

- We applaud ODS for establishing the Trans-NIH Resilience Working Group to look beyond reducing illness and also focus on how to enhance health and lengthen life. The benefits of nutrients and bioactives have traditionally been assessed through the lens of correcting deficiencies or preventing disease, but research shows that they can play important roles in health promotion, healthy aging, and active lifestyle throughout the age spans. However, scientific consensus on a research paradigm on how to assess optimal health is lacking. We encourage ODS and the Working Group to support the development of such a research paradigm.

Is there anything that ODS can do differently to meet the needs of its stakeholders?

- ODS provides educational materials to health professionals through fact sheets and other materials on their website. Additionally, ODS offers a dietary supplement research practicum to academics, doctoral students, and postdoctoral fellows; healthcare practitioners; and other professionals with advanced biomedical degrees. While the information is useful, it may not reach the healthcare provider community broadly unless these professionals proactively seek it out. We recommend that ODS target educational outreach to healthcare providers, including doctors, physician assistants, nurse practitioners, pharmacists, and others who regularly counsel their patients about nutrition, diet and supplement usage, who generally do not receive adequate education on nutrition and dietary supplements.
- We commend ODS for providing fact sheets as a resource for health professionals and consumers. These fact sheets, and other information on the ODS website, should be regularly updated to reflect the evolving science on various dietary supplement categories. For example, there is a growing body of research on the effects of probiotics on different health endpoints beyond the few that are listed on the Probiotics Fact Sheet. Probiotics are a popular category of dietary supplements, and it is important for consumers and health professionals have access to accurate, up-to-date information that reflects the full range of potential health benefits.

Thank you for this opportunity to provide our feedback.



Andrea Wong, Ph.D
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