



October 23, 2026

Division of Program Coordination, Planning, and Strategic Initiatives
Office of the Director
National Institutes of Health

Submitted via email: DPCPSIreorgcomments@nih.gov

**Re: Proposed Reorganization of the Office of Dietary Supplements; 91 FR 65229;
Document No. 2026-20891**

Dear DPCPSI Leadership:

The American Herbal Products Association (AHPA), Consumer Healthcare Products Association (CHPA), Council for Responsible Nutrition (CRN), and United Natural Products Alliance (UNPA) appreciate the opportunity to comment on the proposed reorganization that would place the Office of Dietary Supplements (ODS) within the Office of Nutrition Research (ONR).

Dietary supplements play an important role across the continuum of health and wellness, helping Americans meet nutritional needs and supporting their healthspan—the years lived in good health. Research on dietary supplements extends beyond their nutritive value to examine how botanicals and other bioactive substances affect biological function, the microbiome, resilience, and health. Further, supplement research supports understanding of healthy development and nutrition during critical life stages. Sustained investment in this research aligns with the Make America Healthy Again (MAHA) priorities, as reflected in the MAHA Commission’s strategy, which identifies the “potential health benefits of select high-quality supplements” as an area for research within the National Institutes of Health (NIH).¹

¹ Make America Healthy Again Commission. [Make Our Children Healthy Again Strategy](#).

As trade organizations representing the dietary supplement industry, we support retaining ODS as a stand-alone office within the Division of Program Coordination, Planning, and Strategic Initiatives (DPCPSI). Since its establishment in 1995, ODS operated as a suboffice of the Office of Disease Prevention until January 2020, when it was elevated to a stand-alone office within DPCPSI. We believe this elevation is conducive to ODS maintaining the authority, resources, scientific scope, and access necessary to effectively and efficiently fulfill its statutory mandate and implement its FY 2025–2029 Strategic Plan.

We support meaningful collaboration between ODS and ONR. Dietary supplements contribute to total nutrient intake, and supplement research can strengthen understanding of nutritional status, health outcomes, and individual responses to nutritional interventions. However, the scientific relationship between the offices does not, by itself, establish that placing one under the other would improve their effectiveness. The notice's stated goal of organizational alignment requires further explanation, particularly given ODS's distinct statutory responsibilities.

Preserve ODS's distinct statutory mission and advisory role

Congress established ODS through the Dietary Supplement Health and Education Act of 1994 ("DSHEA") to advance scientific understanding of dietary supplements and their potential contributions to health. It was expressly created by Congress to explore more fully the potential role of dietary supplements as a significant part of the efforts of the United States to improve health care; and to promote scientific study of the benefits of dietary supplements in maintaining health and preventing chronic disease and other health-related conditions.² The office's responsibilities include conducting and coordinating research, compiling scientific information and coordinating NIH funding relating to dietary supplements. Significantly, Congress also created the office to serve another distinct role in the overall framework of DSHEA. Congress gave ODS the statutory mandate to "serve as the principal advisor to the Secretary and to the Assistant Secretary for Health and provide advice to the Director of the National Institutes of Health, the Director of the Centers for Disease Control and Prevention, and the Commissioner of Food and Drugs on issues relating to dietary supplements."³ It is clear that in giving ODS this responsibility that Congress intended the office to have direct lines of communication with

² Dietary Supplement Health and Education Act of 1994, Public Law 103-417 (Oct. 25, 1994) Subpart 4, codified at 42 USC 287c-11.

³ *Id.*

the NIH Director. These responsibilities also require dedicated expertise and effective coordination across NIH and the federal government that would be complicated, not streamlined, by placing the office under ONR.

We recognize that ODS's statutory establishment within NIH does not explicitly prescribe its precise placement within DPCPSI. Nevertheless, any reorganization with the goal of increasing government efficiency and effectiveness should not create another bureaucratic layer which complicates ODS's ability to carry out the full breadth of its statutory responsibilities.

Maintain the full scope of the ODS Strategic Plan

The ODS FY 2025–2029 Strategic Plan articulates a vision which comports with the office's statutory authority: for ODS to serve as the scientific authority and convening body for advancing the study of dietary supplements. Its priorities include biological effects, population use, composition, quality, safety, efficacy, research methods, databases, and translation of findings for multiple audiences.⁴ These priorities relate directly back to the statutory reasons ODS was created to foster research relating to dietary supplements and “the extent to which the use of dietary supplements can limit or reduce the risk of diseases such as heart disease, cancer, birth defects, osteoporosis, cataracts, or prostatism...”⁵

This work extends beyond addressing nutrient deficiencies. Research on botanical constituents, probiotics, peptides, among other dietary substances all extend beyond “nutrition research.” Exploring questions about complex formulations, bioavailability, product integrity, and supplement–medication interactions requires sustained attention even when it does not fit readily within a narrow “nutrition” initiative. Subsuming ODS within ONR could easily lead to a reduction or elimination of attention to non-nutritive benefits of supplementation.

ODS's specialized infrastructure also warrants explicit protection. Its Analytical Methods and Reference Materials program and dietary supplement databases provide resources for rigorous research and interpretation of findings. Its fact sheets, scientific workshops, and workforce development activities serve researchers, health professionals, consumers, and other stakeholders. We are concerned that these functions may not be adequately supported and accountable under the proposed structure that could lessen ODS's

⁴ NIH Office of Dietary Supplements. [Strategic Plan, FY 2025–2029](#)

⁵ See DSHEA, codified at 42 USC 287c-11.

prominence within NIH, lead to reduced funding and staffing, and diminish its ability to coordinate science across disciplines and specialties.

Strengthen collaboration without unnecessarily reducing ODS's standing

ONR's FY 2026–2030 Strategic Plan offers important opportunities for collaboration on topics such as precision nutrition, nutritional assessment, methodological rigor, workforce development, and nutrition regulatory science.⁶ We welcome efforts to ensure that dietary supplement use is appropriately captured in these research areas.

The ODS Strategic Plan already identifies ONR as a partner in developing biomarkers of nutritional intake and status. This existing relationship demonstrates that collaboration can occur while both offices retain stand-alone status.

This approach is also consistent with NIH's proposed MAHA Strategic Framework for addressing chronic disease, which emphasizes leveraging existing NIH organizational infrastructure, strengthening cross-NIH coordination, and building on existing efforts rather than creating new bureaucracy or replacing what is working. Maintaining ODS as a stand-alone office while strengthening its collaboration with ONR would advance these same objectives.⁷

We encourage NIH to consider additional shared research initiatives, coordinated investments, and measurable collaboration goals for ONR and ODS. Before changing the organizational relationship between the offices, NIH should explain what barriers this additional collaboration cannot resolve.

Provide an implementation plan and enforceable accountability

If NIH moves forward with reorganization as proposed, the Institutes should publish a plan addressing the following safeguards and provide stakeholders with an opportunity to comment:

1. Mission and scientific scope - Preserve ODS's full statutory responsibilities and supplement-specific strategic priorities, including research on botanicals and other non-nutrient ingredients.

⁶ NIH Office of Nutrition Research. [Strategic Plan, FY 2026–2030](#).

⁷ National Institutes of Health. [Proposed Make America Healthy Again \(MAHA\) Implementation Strategy & Governance Structure](#), NIH MAHA Strategic Framework.

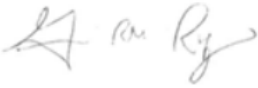
2. Leadership and decision-making authority - Retain an identifiable ODS director with clearly defined authority over its research agenda, programs, partnerships, and scientific communications.
3. Resources - Maintain transparent, separately identifiable ODS funding and staffing (full-time employees) sufficient to fulfill its statutory mandate.
4. Advisory access and coordination - Preserve the ODS director's ability to provide the advice mandated by statute to the NIH Director, to coordinate directly with NIH institutes, centers, offices, and with other federal partners such as Secretary of Health and Human Services (HHS), Assistant Secretary for Health, the Director of the Centers for Disease Control and Prevention (CDC), and the Commissioner of Food and Drugs (FDA), as contemplated in the original statutory authorization.⁸
5. Program continuity and public access - Sustain ODS's specialized scientific infrastructure, databases, information resources, coordinating committee, and direct stakeholder engagement.
6. Evaluation - Establish public baseline measures and review the restructuring's effects on supplement research, resources, services, and coordination within two years.

We strongly urge NIH to retain ODS as a stand-alone DPCPSI office while pursuing stronger collaboration with ONR. As stated above, placing ODS within ONR would create an additional layer of bureaucracy in the implementation of ODS's statutory mandate to serve as advisor to the HHS Secretary, Assistant Secretary for Health, the NIH Director, the CDC Director, and the FDA Commissioner on issues regarding dietary supplements. Any future restructuring should follow a demonstrated need and a concrete plan that protects ODS's statutory mission and strategic commitments.

⁸ See DSHEA, codified at 42 USC 287c-11.

We appreciate NIH's consideration and welcome continued dialogue on strengthening dietary supplement science.

Sincerely,



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