



September 30, 2016

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

Re: Office of Dietary Supplements Draft Strategic Plan 2016–2021

Dear Dr. Coates:

The Pew Charitable Trusts (Pew) offers these comments in support of the Office of Dietary Supplements' (ODS) proposed strategic goal: *to translate dietary supplement research findings into useful information for consumers, health professionals, and policymakers.*

Pew is an independent, nonpartisan research and policy organization with a focus on the safety and regulation of dietary supplements.

We commend ODS for including a standalone goal to address the communication of objective scientific information regarding supplements to consumers, healthcare professionals, industry, and policymakers. We strongly support carrying forward that goal in the final 2016–2017 strategic plan, and we respectfully submit the following comments for your consideration.

Include an Evaluation of Public-Facing Information

The number of supplement products available in the United States has grown from about 4,000 in 1994 to more than 55,000 in 2012, with ingredients including vitamins, minerals, herbs and other botanicals, and amino acids.¹ More than half of adults take at least one supplement,² with use particularly prevalent among older persons and in children. More than 70 percent of adults aged 71 years and older currently taking a supplement.³ Nearly 40 percent of children younger than 18 years of age take dietary supplements, and only about 15 percent do so on the recommendation of a health care professional.⁴

Consumers need access to objective and current scientific information on the safety and efficacy of these products. We support ODS' goal to translate research findings into resources for consumers, health professionals, and policymakers, but urge an evaluation component to assess the effectiveness of those public-facing resources.

As outlined in the draft strategic plan, ODS proposes to communicate information on dietary supplements through various channels, primarily through its website, but it is important to be sure that ODS' resources are reaching those target populations. Furthermore, ODS should evaluate whether the information in the most viewed materials on the ODS website – dietary supplement fact sheets – is understandable for those consumer groups, particularly regarding safety issues.

Healthcare professionals also need to keep up-to-date with information on dietary supplements, especially potentially harmful supplement-drug interactions and other preventable safety concerns. We recommend

that ODS evaluate the extent that their fact sheets and newsletters reach health providers, as well as providers' perceived effectiveness of their usefulness to guide discussions with patients.

Conclusion

The Pew Charitable Trusts supports the ODS' proposed goal to translate dietary supplement research into useful information for consumers, healthcare professionals, and policymakers. We encourage ODS to include an additional strategy (Strategy 4-4) to evaluate the effectiveness of those resources in influencing consumer decisions and health care professionals' recommendations.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Elizabeth Jungman', with a long horizontal flourish extending to the right.

Elizabeth Jungman, JD, MPH
Director, Public Health Programs
The Pew Charitable Trusts

¹ U.S. Government Accountability Office, "Dietary supplements: FDA may have opportunities to expand its use of reported health problems to oversee products (GAO-13-244)" (March 18, 2013), <http://www.gao.gov/assets/660/653113.pdf>.

² Reagan L. Bailey et al., "Dietary supplement use in the United States, 2003–2006," *The Journal of Nutrition* 141, no. 2 (2011): 261-266, doi: 10.3945/jn.110.133025.

³ Ibid.

⁴ Johanna Dwyer, et al., "Prevalence and predictors of children's dietary supplement use: the 2007 National Health Interview Survey," *The American Journal of Clinical Nutrition* 97, no. 6 (2013): 1331-1337, doi: 10.3945/ajcn.112.052373 and Reagan L. Bailey et al., "Why U.S. children use dietary supplements," *Pediatric Research* 74, no. 6 (2013): 737-741, doi: 10.1038/pr.2013.160.