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Department of Health and Human Services

Office of the Assistant Secretary for Planning and Evaluation

RE: Request for public comments on HHS Strategic Plan

Submitted via electronic mail to: [HHSPlan@hhs.gov](mailto:HHSPlan@hhs.gov).

### **HHS Strategic Plan FY 2022-2026**

The Institute of Food Technologists (IFT) appreciates the opportunity to provide input on the HHS FY 2022-2026 Strategic Plan. We are encouraged by the request for input into the HHS Strategic Plan, as the health and wellness of the U.S. population is strongly connected to the foods and beverages that they consume.

IFT is a global organization of approximately 12,000 individual members from 95 countries who are committed to advancing the science of food. Since 1939, IFT has engaged experts in food science, technology and related professions from academia, government and industry to help solve many of the world's greatest food related challenges. IFT provides scientific, technical and career development resources for advancing the science of food and its application across global food and agricultural systems. Our primary mission is to connect global food system communities to promote and advance the science of food and its applications. We believe that science is essential to ensuring a global food supply that is sustainable, safe, nutritious and accessible to all.

Our food system is inextricably linked with and has a significant impact on human health. For example, good dietary choices play a significant role in maintaining an individual's health and reducing the risk of many diet-related chronic diseases (such as Type 2 diabetes and heart disease). Similarly, foodborne illness due to bacterial, fungal, and viral contamination leads to sickness in around 48 million people within the US population annually, with about 128,000 hospitalized and thousands of deaths and billions in lost wages per year as estimated by the CDC. Food is also the third largest contributor to the U.S. GDP, and as the recent experiences with the COVID-19 pandemic have shown, disruptions to the U.S. food supply can have a major impact on the availability and selection of food options for U.S. consumers.

The modern food system is also complex and intertwined with the environment, economy and society in a myriad of ways and is vulnerable to factors such as climate change, pollution and global trade, among many others. These vulnerabilities call for strategic focus by HHS to reduce the potential impact they can have on the food choices of consumers and therefore, their health and wellness.

In response to your request for public input regarding the Draft HHS Strategic Plan, the Institute of Food Technologists (IFT) is pleased to submit the following comments regarding pertinent food and nutrition science and technology related strategic goals and objectives in your draft plan document.

***Objective 1.2: Reduce costs, improve quality of healthcare services, and ensure access to safe medical devices and drugs***

IFT recommends that HHS consider adding “foods” after “safe medical devices,” considering part of the mission of FDA and CDC is related to a safe food supply to prevent negative foodborne impacts on public health. Additionally, IFT would recommend HHS add a separate strategy under this objective specific to a safe food supply.

***Objective 2.3: Enhance promotion of healthy behaviors to reduce occurrence and disparities in preventable injury, illness and death.***

The Dietary Guidelines for Americans (DGA) are the authoritative source for science-based guidance on healthy eating in the U.S. The DGA is used by health professionals, policymakers and the food industry to establish communications, programs, policies and innovations that promote healthful dietary choices. However, consumer awareness and adherence to the DGA recommendations remains poor, and dietary quality in the U.S. population has shown limited improvement over the past decade.

In May, 2021, IFT, in partnership with the Department of Food Science at the University of Massachusetts, Amherst and funded by USDA/NIFA, convened a multidisciplinary team of food scientists, dietitians, nutrition scientists, behavioral scientists, healthy eating communicators/influencers and consumer advocates to discuss opportunities and strategies to improve consumer adoption of the DGA recommendations. Participants acknowledged the importance of MyPlate in translating scientific guidance into consumer-friendly communications. During the meeting, it was agreed that there is a substantial opportunity to broaden the reach of these important dietary choice messages to U.S. consumers by significantly enhancing partnerships, collaborations and additional investment among key food, nutrition and health stakeholders.

With many conflicting messages in the U.S. media about diet and health, it is critical that HHS consider how to improve alignment of multiple stakeholders on science based dietary messaging like DGA and MyPlate. These stakeholders include food scientists & nutritionists, health care professionals, related health insurance providers, schools, food producers, marketers and retailers, food service operators, chefs, athletic coaches, religious leaders, social media influencers, major media services, celebrities and any other public or private entities invested in the health of the U.S. population. IFT believes it will take united collaboration across those stakeholders in concert with government agencies (HHS, Department of Agriculture) to drive improvement in healthy dietary choices within the U.S. holistically.

***Objective 2.4: Mitigate the impacts of environmental factors, including climate change, on health outcomes.***

As stated in the introduction, climate change and the effects of the COVID-19 pandemic inherently call for improvements to the ability to predict, assess, reduce and recover from such factors to protect our food supply and inter-related health and wellness. IFT agrees with the need stated in the draft HHS Strategy to enhance collaborations across federal agencies and the international sector to address the safety and availability of food and mitigate potential nutritional deficits for the U.S. IFT would recommend additional consideration be given to the following areas that are not explicitly addressed under Strategic Goal 2 and might best fit here or possibly Objective 2.2.

For example:

- Enhancement of food safety to prevent foodborne illness and mitigate its impact on public health, building on the **FDA's New Era of Smarter Food Safety Blueprint**, including technology enabled Food Traceability, improved tools for prevention and response to foodborne illness outbreaks, modernization of FDA tools to engage with new food industry innovation and business models, and strengthening food safety culture.

IFT encourages HHS specifically to continue the efforts to build the foundations and encourage adoption of digital food traceability and help expand food traceability into the global arena with the substantial interconnectedness of our food supply with other countries.

Regarding food safety culture, IFT recommends that HHS consider how it can not only improve industry efforts on food safety culture from farm to retailer, but also food safety education of students in K-12 school curricula.

***Objective 3.1: Provide effective and innovative pathways leading to equitable economic success for all individuals and families***

Equitable success includes availability of nutritious and healthful foods for individuals and families. Regarding the strategy on **Facilitating system enhancements and partnerships across the federal government to coordinate resources and technical assistance to individuals and families hoping to achieve and sustain economic independence**, under the bullet point starting with:

*Encourage states to collaborate across programs and systems so that families hoping to achieve economic security have access to income and housing support, education...*

IFT would recommend HHS add to the list: "*safe and nutritious foods*", as well as "*education about healthful food choices*".

IFT would also encourage HHS to work further with USDA on the area of healthful foods and education about healthy food choices under programs such as SNAP, WIC, etc. as an important partnership opportunity across the federal government, as well as partnering with State level agencies.

***Objective 3.2: Strengthen early childhood development and expand opportunities to help children and youth thrive equitably within their families and communities.***

Regarding the strategy: **Foster the physical, emotional, intellectual, language, and behavioral development of children and youth while supporting their families and caregivers**

IFT strongly supports this strategic direction and would highlight the importance of diet to supporting this development strategy.

Regarding the bullet point:

*Coordinate federal interagency efforts and target resources aimed at improving environmental health and healthy development in children by reducing exposure to environmental risk factors;*

IFT would recommend adding to the list “foodborne pathogens”.

Regarding the bullet point:

*Improve growth and development prospects of children, including enhanced dietary quality and reduction in risk factors for preventable non-communicable disease, through promotion of healthy eating and dietary guidelines, nutrition education and standards, physical activity, oral health and hygiene, and other feeding and nutrition programs or collaborations aimed at supporting children and families, especially in rural, low-income, and other high-risk areas*

IFT believes this area is crucial to address and would recommend that HHS consider partnering with USDA to work with States regarding better utilization of the DGA recommendations. For the first time in 2020, DGA’s addressed nutrition throughout the life cycle and the critical nutritional needs of children from infancy to teenage years. These DGA recommendations are critical to informing the policies and practices of school nutrition programs that intersect with state and local government. School foodservice providers often have difficulty implementing the DGA guidance in the development of foods for schools. Specifically, IFT recommends greater coordination and resource support between USDA and HHS to help drive improved health and wellness outcomes in schools. Additionally, IFT recommends engaging with foodservice operators as key stakeholders while addressing the issue of encouraging healthy choices for students. Finally, the COVID-19 pandemic and virtual schooling highlighted the importance of HHS addressing DGA’s and healthy dietary choices at the family level when students were not in school physically.

***Objective 3.3: Expand access to high-quality services and resources for older adults and people with disabilities, and their caregivers, to support increased independence and quality of life.***

Regarding the strategy: **Enhance system capacity to address the health, health related outcomes, and social determinants of health for older adults and individuals with disabilities by developing processes, policies and supports that are person centered and provide quality care for older adults and individuals with disabilities, at home or in community-based settings;**

Within this objective there is no reference to access to healthy foods for older adults, which is a significant health contributing component of care. IFT recommends that HHS include within this

objective an explicit reference to the importance of diet on elderly health to mitigate chronic conditions linked to diet like osteoporosis, sarcopenia, and numerous other diet related conditions, in concert with the DGA recommendations for older adults. IFT believes enhancing communication of and education about the DGA for this cohort is a key component of enabling this strategy.

***Objective 4.1: Improve the design, delivery and outcomes of HHS programs by prioritizing science, evidence and inclusion.***

Under the strategy: **Leverage stakeholder engagement, communication and collaboration to build and implement evidence-based interventions for stronger health, public health, and human services outcomes;**

IFT recommends that HHS include a bullet point regarding improving communication both across HHS and “*across other relevant U.S. Departments*” to bring together research and evaluation to better inform translation of evidence to drive stronger health outcomes.

Similarly, regarding the bullet point:

*Promote sharing of lessons learned between grantees, from grantees to HHS staff, and where applicable, the broader community;*

IFT recommends developing a process for inclusion of such sharing of lessons learned specifically with other relevant U.S. Departments such as Agriculture to optimize the scientific outcomes of research work.

Finally, regarding the bullet point:

*Build participation into research agendas by engaging stakeholders, including those with lived experience and citizen scientists, in the design and revision of evaluation and data collection systems and advancing equity amongst researchers and those communities targeted or underrepresented by research efforts;*

As highlighted earlier under Objective 2.3, there is significant need for HHS to engage stakeholders on the communication and education components of the Dietary Guidelines for Americans (DGA) and MyPlate to drive improved health outcomes through diet.

***Objective 4.2: Invest in the research enterprise and scientific workforce to maintain leadership in the development of innovations that broaden our understanding of disease, healthcare, public health and human services resulting in more effective interventions, treatments and programs.***

Over the past decade, there has been a decline of research in support of food and nutrition science and technology as it relates to human health impacts and improvements in comparison to other federally funded research investments on disease and healthcare. **(See IFT White Paper: Food Research – Call to Action on Funding and Priorities, January 2020).**

IFT recommends to HHS that they state explicitly in the above Objective 4.2 the importance of diet upon health. Specifically, we would suggest modifying Objective 4.2 to state:

*Invest in the research enterprise and scientific workforce to maintain leadership in the development of innovations that broaden our understanding of disease, healthcare, **nutritious and healthful food choices**, public health and human services resulting in more effective interventions, treatments and programs.*

While nutritious and healthful food choices could be interpreted as falling generally under the terms, “disease”, “healthcare”, and “public health” as written in Objective 4.2, IFT believes that this should be called out more prominently to drive greater focus on research investment here due to the obvious impact of dietary choices on the health of the U.S. public and the historical decline in research investment in this area relative to other research investments in public health.

Beyond the addition of “nutritious and healthful food choices” to Objective 4.2, IFT would recommend within the Strategy: **Recruit, retain and develop a diverse and inclusive scientific workforce to conduct basic and applied research in disease, healthcare, public health and human services**; that again the words “**nutritious and healthful food choices**” be added to the Strategy and that a bullet point specific to increasing research on food and nutrition science for improving health, as well as attracting and retaining related food and nutrition science personnel be included.

Additionally, under the Strategy: **Support, conduct and translate research into interventions that improve the health and well-being for all**;

IFT would ask HHS to consider adding to the bullet point:

*Provide research grants for areas that are cutting edge in technology or disease, and grow those resources*

the phrase “*food science and nutrition,*” after “*in technology or disease*” to stress the importance of advancing research in this area.

**Objective 4.3: Strengthen surveillance, epidemiology, and laboratory capacity to understand and equitably address diseases and conditions.**

Under the Strategy: **Expand capacity to improve laboratory safety and quality, detect and prevent public health threats, monitor health conditions, understand the unique needs of various sub-groups of persons, and establish the pipeline for future professionals**; within the bullet point:

*Building expertise in cutting edge laboratory, surveillance and epidemiology techniques to address public health threats and disease conditions, including...;*

IFT would recommend to HHS that within the list of health threats and disease conditions that “**foodborne illness**” be added explicitly, considering the impact foodborne illness has on the U.S. public each year as referenced earlier. Additionally, we would propose that reference be made within this strategy to the **FDA’s New Era of Smarter Food Safety Blueprint** and its related components.

**Objective 4.4: Improve data collection, use and evaluation, to increase evidence-based knowledge that leads to better health outcomes, reduced health disparities, and improved social well-being, equity and economic resilience.**

Under the Strategy: **Establish a department wide approach to data collection, close data gaps, transform data, and share data for better HHS analysis and evaluation.**

IFT would recommend HHS consider modifying the bullet point:

*Invest in and promote intra-agency data sharing, including data linkages, interoperability of data, and data harmonization and standardization to leverage data, metrics and information to improve analysis and evaluation of Department programs.*

Specifically, IFT would ask HHS to consider adding to the phrase “*promote intra-agency data sharing*” the words “*and inter-agency*” to help drive the development of common data systems and linkages with sister U.S. Departments.

Overall, IFT commends HHS on developing a holistic Draft Strategic Plan for 2022-2026 and the supporting objectives and goals that can enable the improvement of health and well-being across the U.S. population, particularly driving for equity in health & wellness with a focus on the currently under-served. IFT appreciates the opportunity to provide input into the HHS strategic plan development. If there are any questions from HHS staff regarding our input, please contact our Chief Science and Technology Officer, John Ruff at [JRuff@ift.org](mailto:JRuff@ift.org); 312-782-8424.

Sincerely,



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