American Society for Nutrition
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October 15, 2019

Barbara Schneeman, Ph.D.
Chair, 2020-2025 Dietary Guidelines Advisory Committee
c/o Eve Stoody, PhD
Designated Federal Officer
Center for Nutrition Policy and Promotion, Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive, Room 1034
Alexandria, VA 22301

Re: 2020 Dietary Guidelines Advisory Committee (DGAC) Deliberations and Report

Dear Dr. Schneeman and other DGAC members:

The American Society for Nutrition (ASN) appreciates the opportunity to provide input to the 2020 Dietary Guidelines Advisory Committee (DGAC) as you consider the scientific basis for the ninth edition of the *Dietary Guidelines for Americans* (DGAs). ASN is a scientific, professional society dedicated to bringing together the world's top researchers to advance our knowledge and application of nutrition.

ASN welcomes the opportunity to serve as a resource for the DGAC as you move forward with the evaluation of the latest nutrition science.

> ASN represents more than 6,500 nutrition scientists and researchers who work globally in academia, industry, government, non-profit, and clinical settings to help all individuals lead healthier lives. ASN is proud of our members who currently serve on the DGAC and those who have served on past Committees. The ASN membership has a wealth of expertise in nutrition science across the entire research spectrum from basic science to health policy, from discovery to application. ASN offers our assistance in identifying experts to brief the DGAC on select subjects when necessary. ASN has 17 Research Interest Sections to draw from, with experts in such topical areas as Perinatal, Maternal and Pediatric Nutrition; Aging and Chronic Disease; Diet and Cancer; Obesity; Community and Public Health Nutrition; and Nutritional Epidemiology, to name a few.

ASN encourages the DGAC to include existing high-quality systematic reviews and meta-analyses outside of those conducted using Nutrition Evidence Systematic Review (NESR) in the evidence review if they meet standards established by USDA and HHS and address the specific research questions of the DGAC.

> ASN supports the continued use of a strong, evidence-based approach emphasizing a rigorous scientific process and transparency throughout, including the systematic review of ***all*** evidence

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considered on key topics. Confining the Committee to only NESR-conducted systematic reviews and building upon previous versions of the *Dietary Guidelines for Americans* limits the credible science that will form the basis of the 2020-2025 *Dietary Guidelines for Americans*. The DGAs should reflect the latest scientific evidence. The exclusion of the existing full data set of the nutrition science that is available undercuts the scientific credibility of the review. This will have ramifications for public health well into the future, since the *Dietary Guidelines for Americans* form the basis for all Federal nutrition policy and programs, nutrition education efforts and are used to guide business decisions and local, state, tribal, and national health initiatives.

The 2017 National Academies of Sciences, Engineering, and Medicine (NASEM) report[i], "Redesigning the Process for Establishing the Dietary Guidelines for Americans," states that "where existing systematic reviews and meta-analyses are high-quality, relevant, and timely, we strongly believe that they should be utilized." Although the NASEM report points out certain challenges with existing systematic reviews, the Committee ultimately recognized the significant time and resources needed to conduct original, sometimes duplicative reviews and how existing systematic reviews, meta-analyses, and reports serve to limit redundancy of efforts when existing reviews adequately address DGAC research questions.

The 2015 DGAC utilized existing high-quality external systematic reviews, meta-analyses, or reports to answer nearly half (45%) of its research questions and utilized NESR's predecessor, the Nutrition Evidence Library, to answer only 27% percent of its questions. The decision to not use outside systematic reviews or meta-analyses limits the scientific credibility of the DGAC process and forthcoming report. The DGAC report will not reflect the entire, current body of nutrition science which weakens the dietary guidance given to the public and on which all Federal nutrition policy and programs are based. This decision will also significantly impact the workload for an already delayed process.

If existing high-quality systematic reviews and meta-analyses are not ultimately used in the development of the 2020-2025 *Dietary Guidelines for Americans*, we recommend that the DGAC and NESR share lessons learned regarding this unprecedented change in procedure to better guide this decision-making process for future editions of the *Dietary Guidelines for Americans*.

ASN appreciates the life stage approach of the 2020 DGA process with the addition of dietary guidance for pregnant women, as well as infants and children from birth to 24 months of age, included in this edition of the DGAs.

It is critically important that nationally recognized dietary guidance for pregnant women and infants and children from birth to 24 months be developed, given the major impact of nutrition during these formative, transitional periods. Promising randomized controlled trial research suggests that higher maternal choline intakes during pregnancy can directly impact infant cognition, with lasting effects now being shown in children years later[ii, iii]. ASN appreciates that the evidence review will include the impact of diet on the metabolic and physiological changes that occur over the life course and during life stage transitions, such as with neurocognitive health.

ASN appreciates the emphasis given to neurocognitive health and its relation to diet and nutrition by the 2020 DGAC, particularly for children from birth to 24 months as well as the aging adult population.

More than 21% of the total U.S. population is expected to be ages 65 and older by 2050[iv]. Several systematic reviews and meta-analyses have shown a beneficial effect of the Mediterranean-like dietary pattern or its' components (high levels of n-3 PUFAs, fish, fruits and vegetables) on cognitive health and prevention of Alzheimer's disease and dementia which the DGAC should further explore[v,vi,vii].

ASN urges the DGAC to consider the behavior changes necessary for Americans to translate and implement the dietary recommendations set forth in the Guidelines in order to improve compliance with the Guidelines, **as less than 10% of Americans actually follow the Guidelines[i]".**

Food accessibility, affordability, marketing, and culture are all factors which may have a significant influence on food intake and other food-related behaviors, and therefore affect translation and implementation of the Guidelines. The need to balance nutrients, foods and behaviors to achieve a healthful eating pattern should be highlighted.

ASN suggests that sleep and screen time be considered along with the diet and health impact of eating occasions, frequency and timing.

Both the 2010 and 2015 Dietary Guidelines mention the importance of limiting screen time in favor of increased physical activity, but lack of high-quality sleep and its relationship with eating behavior and food preference[viii,ix] has not been addressed.

ASN recommends broadening the dietary patterns considered by addressing multicultural dietary patterns to better include our diverse society, with examination of the role acculturation has on diet and health.

While the Scientific Report of the 2015 DGAC noted that acculturation status may be an indicator of dietary intake, it found that sample sizes were too small for acculturation to be a measurable variable and recommended future research focus on this important area. ASN appreciates the continued focus on dietary patterns, including intakes of various food groups and nutrients.

ASN urges the Committee to continue to make recommendations regarding under consumed nutrients for the public, as well as focus on overconsumed nutrients.

The 2015 DGAs identified numerous nutrients of public health concern: calcium, potassium, dietary fiber, choline, magnesium, and vitamins A, D, E, and C and we encourage the 2020 DGAC to update this list, as needed. With the current life stage approach to the 2020 DGAC report, it is particularly important to examine the importance of certain nutrients at various life stages, such as for aging adults and for infants and children from birth to 24 months.

ASN believes the Committee should consider the role that dietary supplements play in dietary intake of micronutrients and how individuals may translate dietary guidance into supplement usage, which could have both positive and negative repercussions.

ASN appreciates that the Committee will examine the intake of specific nutrients from supplements and/or enriched/ fortified foods for certain subpopulations, such as young children or aging adults given that more than 50% of U.S. adults currently report use of a dietary supplement[x].

ASN recommends the 2020-2025 DGAs should continue to promote chronic disease prevention and ensure nutritional sufficiency. **However, it is equally important that the DGAC recognize that nearly half of the U.S. population lives with a nutrition-related disease or health condition**.

> Nearly 40% of the adult U.S. population was obese in 2015, 29% had hypertension[xi] and more than 12% had diabetes[xii], with even more, 33.9%, living with prediabetes, which may result in diabetes within 5 years. Dietary guidance for individuals living with nutrition-related diseases is important for the stability and maintenance of their health and wellbeing, and the prevention of additional nutrition-related comorbidities. ASN supports the consideration of diet and nutritional biomarkers for chronic disease endpoints when developing guidance that addresses health and disease. However, the development of recommendations should not be hindered or delayed by the ongoing process of discovery and validation of nutritional biomarkers for diet related disease risk.

ASN appreciates a continued focus on highlighting future research needs and gaps for nutrition scientists and researchers to act on to continue to advance nutrition science, as well as dietary guidance.

> A continued investment in nutrition research funding is necessary to allow nutrition researchers to investigate the important research needs and gaps identified by the DGAC and to allow for progress in future editions of the DGAs. More recommendations on how to implement the DGAs in order to move Americans toward compliance is needed, and ASN recommends that collaborators continue to be engaged. ASN stands ready to assist with dissemination and implementation of the DGAs. The DGAs should advise Americans not just on what to eat but provide guidance to help individuals understand how to change their eating and food behaviors in order to improve their diet and therefore health.

Sincerely,

John E. Courtney, Ph.D.
Chief Executive Officer, ASN

[i] National Academies of Sciences, Engineering, and Medicine. 2017. Redesigning the process for establishing the Dietary Guidelines for Americans. Washington, DC: The National Academies Press. doi: 10.17226/24883

[ii] Maternal choline supplementation during the third trimester of pregnancy improves infant information processing speed: a randomized, double-blind, controlled feeding study. *FASEB J* 2018, 32, 2172; doi:10.1096/fj.201700692RR

[iii] Prenatal choline supplementation improves child color-location memory task performance at 7 Y of age. *C Devel Nutr* 2019, 3(1), 1260; doi: 10.1093/cdn/nzz052.FS05-01-19

[iv] The Population 65 Years and Older in the United States: 2016. U.S. Census Bureau 2018, https://www.census.gov/library/publications/2018/acs/acs-38.html. Accessed September 16, 2019.

[v] The Association between the Mediterranean Dietary Pattern and Cognitive Health: A Systematic Review. *Nutrients* 2017, *9*(7), 674; doi: 10.3390/nu9070674

[vi] Adherence to Mediterranean diet and risk of developing cognitive disorders: An updated systematic review and meta-analysis of prospective cohort studies. *Sci Rep* 2017, 7, 41317; doi: 10.1038/srep41317

[vii] Adherence to a Mediterranean-Style Diet and Effects on Cognition in Adults: A Qualitative Evaluation and Systematic Review of Longitudinal and Prospective Trials. *Front Nutr* 2016, 3, 22; doi: 10.3389/fnut.2016.00022

[viii] Sleep restriction leads to increased activation of brain regions sensitive to food stimuli. *Am J Clin Nutr* 2012, 95(4), 818, doi: 10.3945/ajcn.111.027383

[ix] Association of self-reported sleep duration with eating behaviors of American adults: NHANES 2005–2010. *Am J Clin Nutr* 2014, 100(3), 938, doi: 10.3945/ajcn.114.085191

[x] Contribution of Dietary Supplements to Nutritional Adequacy in Various Adult Age Groups. *Nutrients* 2017, 9(12), 1325, doi: 10.3390/nu9121325

[xi] Prevalence of Obesity Among Adults. Prevalence of Hypertension Among Adults. National Center for Health Statistics (NCHS) Fact Sheet. December 2017. https://www.cdc.gov/nchs/data/factsheets/factsheet_nhanes.pdf Accessed September 16, 2019.

[xii] National Diabetes Statistics Report, 2017. Centers for Disease Control and Prevention. https://www.cdc.gov/diabetes/pdfs/data/statistics/national-diabetes-statistics-report.pdf Accessed September 16, 2019.