



American Society for Nutrition
Excellence in Nutrition Research and Practice

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Brandon Lipps
Deputy Under Secretary, Food, Nutrition and Consumer Services
Scott Hutchins, PhD
Deputy Under Secretary, Research, Education, and Economics
U.S. Department of Agriculture (USDA)
1400 Independence Ave., S.W.
Washington, D.C. 20250

Brett P. Giroir, MD
Assistant Secretary for Health
ADM, U.S. Public Health Service
U.S. Department of Health and Human Services (HHS)
200 Independence Avenue, SW
Washington, D.C. 20201

Re: Docket No. FNS-2020-0015-0002; Comments on the 2020 Dietary Guidelines Advisory Committee Scientific Report

Dear Mr. Lipps and Drs. Hutchins and Giroir:

The American Society for Nutrition (ASN) appreciates the opportunity to provide oral and written comments to the U.S. Departments of Agriculture (USDA) and Health and Human Services (HHS) on the Scientific Report of the 2020 Dietary Guidelines Advisory Committee (DGAC), as you consider the scientific basis for the 2020-2025 *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 represents more than 7,500 nutrition scientists, researchers, and practitioners who work globally in academia, industry, government, non-profit, and clinical settings to help all individuals lead healthier lives. ASN notes the important contributions of the many ASN members that led to this report, and applauds the efforts of the 2020 DGAC, particularly given the shortened timeframe in which they had to complete their work.

ASN commends the DGAC's continued focus on healthful dietary patterns, which allow individuals to consume a wide range of foods and beverages to meet nutrient needs in a variety of ways that best suit their lifestyles. ***ASN urges the government to maintain a total diet approach in its translation of the report to dietary guidance.*** ASN supports dietary guidance that helps consumers to select nutrient-rich foods and beverages as part of a healthful diet and that leads to positive behavior changes. ***It is especially important for the government to consider the DGAC's recommendation that dietary guidance should account for cultural preferences and cost considerations which affect dietary patterns and eating behaviors and habits during development of the DGAs. ASN also encourages that overall calorie reduction***

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and obesity prevention continue to be emphasized, such as the need to balance calories with physical activity in order to manage weight and lead a healthy lifestyle.

With respect to dietary patterns, the DGAC's evidence review expands on previous DGACs' work, demonstrating that evidence linking dietary patterns to health outcomes has increased and strengthened. This is particularly important given that six in 10 American adults live with a chronic disease. ***ASN encourages the government to consider the DGAC's recommendation that the DGAs touch on other important public health and chronic disease related issues, including recommending low intake of trans fats, reducing sodium intake, preventing dental caries, and maintaining adequate hydration, among other important topics.*** The state of the evidence suggests that there is a need for a process to address the role of diet and dietary patterns in disease management, and ***ASN encourages the government to continue to consider what that process should be, what evidence is needed, who should manage the evaluation of the evidence, and much more, building on a 2018 National Academies of Sciences, Engineering, and Medicine (NASEM) workshop exploring this important topic***¹.

ASN supports the life stage approach that will be a focal point for this edition of the DGAs, given the important addition of dietary guidance for pregnant and lactating women, infants, and children birth to 24 months of age, and older adults. This is a highly important step toward more comprehensive and consistent efforts to promote nutritional health across the entire lifespan, and ***ASN urges an increased focus on dietary guidance specific to older adults during the 2025 DGAs.*** USDA and HHS must take these diverse populations into account when developing the 2020-2025 DGAs. It is important to ensure the DGAs can be readily understood and adopted by most Americans, particularly consumers as well as health professionals and policy makers, so they can successfully lead to improved public health outcomes.

ASN encourages the government to carefully consider the recommendations within the Scientific Report to create clear, consistent messages that most effectively communicate dietary guidance to the public and are evidence-based. As recommended by NASEM, ASN urges HHS and USDA to be open and transparent regarding the development of the DGAs from the Scientific Report and "provide the public with a clear explanation when the DGA omit or accept only parts of conclusions from the scientific report"² ***to explain the rationale behind dietary guidance for the public.***

¹ National Academies of Sciences, Engineering, and Medicine. 2018. *Examining special nutritional requirements in disease states: Proceedings of a workshop*. Washington, DC: The National Academies Press. doi: <https://doi.org/10.17226/25164>.

² National Academies of Sciences, Engineering, and Medicine. 2017. *Redesigning the Process for Establishing the Dietary Guidelines for Americans*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/24883>.

ASN applauds the Scientific Report’s research recommendations and the DGAC’s efforts to highlight important areas where the research is absent or insufficient. Of particular importance is the recommendation that research be conducted with diverse prespecified populations – diverse in age, gender, race, ethnicity, and socioeconomic backgrounds. For example, most of the research questions for the birth to 24 months of age subpopulation lacked sufficient evidence to reach strong conclusions. The strength-of-evidence should dictate dietary guidance, and nutrition research provides this scientific evidence. Ongoing and future nutrition research is therefore of utmost importance to the development of future DGAs. ***ASN encourages the government to translate key research questions stemming from insufficient or limited evidence in the Scientific Report into funding priorities and encourages researchers to use them as a guide.***

ASN urges the government to take steps to strengthen the federal government nutrition research agenda and coordination to address the needs for future updates of the DGAs. ASN has supported recent calls for strengthened authority, investment, and coordination for nutrition research from the federal government.³ ***ASN strongly urges the government to support a process for timely updates of the Dietary Reference Intakes (DRIs) to provide current, accurate data to be used in DGA development.*** The DGAC also identified a number of other research, monitoring, and surveillance processes needed to develop and translate the DGAs that can be strengthened and better coordinated.

ASN encourages the government to reflect on the many changes in the 2020 Dietary Guidelines process and procedure to evaluate and then share lessons learned regarding what worked well and what needs improvement prior to initiating the 2025 DGAC process to best guide future editions of the DGAs. It is critical for the government to provide an update regarding implementation of the recommendations from the two 2017 NASEM reports related to the DGAs, as well as lessons learned.^{2, 4} Additional funding allocations should be sought to fully implement the recommendations from the two 2017 NASEM reports.

ASN supports efforts to reach a strong, evidence-based approach emphasizing rigorous scientific processes with transparency throughout, and an emphasis on the need for additional research, particularly when there is insufficient or limited quality evidence. As suggested by the DGAC, NESR should explore how to continuously update systematic reviews

³ Fleischhacker SE, et al. 2020. Strengthening National Nutrition Research: Rationale and Options for a New Coordinated Federal Research Effort and Authority. *Am J Clin Nutr*. <https://doi.org/10.1093/ajcn/nqaa179>

⁴ National Academies of Sciences, Engineering, and Medicine. 2017. *Optimizing the Process for Establishing the Dietary Guidelines for Americans: The Selection Process*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/24637>.

on topics of interest for each cycle of the DGAs, while identifying new areas of emerging research for the DGAC to address. ASN has previously shared concerns that the 2020 process excluded certain existing high-quality systematic reviews and meta-analyses outside of those conducted using the USDA's Nutrition Evidence Systematic Review (NESR). We recognize that internal NESR systematic reviews with standardized methodologies have advantages, such as minimizing biases. However, ASN encourages NESR to explore new and evolving methodologies related to the conduct of systematic reviews while also seeking approaches that can incorporate and make use of high-quality data that, for example, may be more than 10 years old or reflect research carried out in other countries. Further, it is important to utilize or develop systematic review methodologies and data analysis techniques specific to nutrition science. Moving forward, such an approach would help apply a set of standards for the use of existing high-quality systematic reviews and meta-analyses outside of those conducted using NESR to address specific research questions and evidence review that best supports future editions of the DGAs. ***ASN also strongly encourages USDA and HHS to pursue further development and implementation of consistent, uniform, and tailored methodologies to grade the strength-of-evidence for future versions of the DGAs.***

As the government calls on its many experts within USDA and HHS from a range of disciplines to craft the DGAs, similarly, ASN encourages the government to form multi-disciplinary partnerships to implement the DGAs. A range of expertise, including nutrition, agriculture, food science, culinary, dietetics, behavior, economic and public health professionals should be used to develop effective messaging to communicate the DGAs to Americans. Consideration must also be given to the many factors that influence food intake and other food-related behaviors, and therefore affect translation and implementation of the DGAs, such as food accessibility, affordability, marketing, and culture. ASN suggests the use of a focus group of potential DGA users from the public, the food industry, and medical and public health communities to provide insight about the implementation of dietary recommendations found in the DGAC report, particularly with the new audiences this edition covers. Collaboration among the aforementioned disciplines and agencies will be important for effective implementation of the DGAs, and ASN stands ready and welcomes opportunities to assist the government with translation and implementation of the DGAs.

Thank you for the opportunity to provide comments. Please contact Sarah Ohlhorst, MS, RD, Chief Science Policy Officer [301-219-9890; sohlhorst@nutrition.org], should you have any questions or if ASN may provide additional information.

Sincerely,



Lindsay H. Allen, Ph.D.
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