



American Society for Nutrition
Excellence in Nutrition Research and Practice

October 28, 2019

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

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

Re: 2020-2025 *Dietary Guidelines for Americans*

Dear Mr. Lipps, Drs. Hutchins, and ADM Giroir:

The American Society for Nutrition (ASN) appreciates the opportunity to provide input regarding the scientific basis for the 9th 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 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 many members who currently serve on the Dietary Guidelines Advisory Committee (DGAC) and those who have served on past Committees.

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* relevant, credible evidence considered on key topics.

ASN writes with concerns that the process to develop the 2020-2025 *Dietary Guidelines for Americans* plans to exclude existing high-quality systematic reviews and meta-analyses outside of those conducted using the USDA's Nutrition Evidence Systematic Review (NESR). ASN encourages USDA and HHS to include existing high-quality systematic reviews and meta-analyses outside of those conducted using NESR in the evidence review for the DGAs if they meet standards established by USDA and HHS and address the specific research questions of the DGAC.

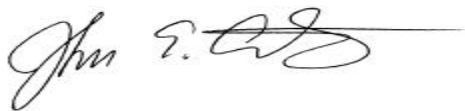
The U.S. Congress-mandated 2017 National Academies of Sciences, Engineering, and Medicine (NASEM) reportⁱ, “Redesigning the Process for Establishing the Dietary Guidelines for Americans,” states that “where existing systematic reviews and meta-analyses are high-quality, relevant, and timely, we strongly 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 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 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.

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*.

Thank you for the opportunity to submit comments to USDA and HHS regarding the 2020-2025 *Dietary Guidelines for Americans*. Please contact Sarah Ohlhorst, M.S., R.D., Senior Director of Advocacy and Science Policy at 240-428-3647 or sohlhorst@nutrition.org if you have any questions or if ASN may provide further assistance.

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](https://doi.org/10.17226/24883)