



American Society for Nutrition
Excellence in Nutrition Research and Practice

June 30, 2023

Department of Health and Human Services
Office of the Assistant Secretary for Health
Office of Disease Prevention and Health Promotion
1101 Wootton Parkway, Suite 420
Rockville, Maryland 20852

RE: Request for Comments to the Dietary Guidelines Advisory Committee on Proposed Protocols (Docket No. HHS-OASH-2022-0005-0001)

Dear members of the 2025 Dietary Guidelines Advisory Committee:

The American Society for Nutrition (ASN) appreciates the opportunity to comment on the proposed protocols that will be used by the 2025 Dietary Guidelines Advisory Committee (DGAC) to evaluate the evidence that will guide development of the 2025-2030 edition of the *Dietary Guidelines for Americans (DGAs)*. ASN has more than 8,000 members around the world, working throughout government, clinical practice, academia, and industry, and conducting research to achieve the ASN vision of “A Healthier World Through Evidence-Based Nutrition”.

ASN applauds the commitment of the DGAC to review all scientific questions through a health equity lens and to consider the many factors, such as age, socioeconomic status (SES), race, ethnicity, and culture, that impact health equity when reviewing the evidence. These factors greatly impact a person’s dietary pattern, eating behavior and eating habits. Health equity will be especially important when considering the scientific questions related to dietary patterns, frequency of meals and/or snacking, and portion size and energy intake and ASN appreciates that the key confounders to be considered include sex, age, SES, race and/or ethnicity in all populations. This approach will better ensure that the resulting guidance in the *DGAs* is inclusive of the diversity of the US population and their cultural and traditional foods and dietary patterns relevant to all Americans regardless of race, ethnicity, and SES, which is important as dietary guidance is most effective when it is practical and actionable for most Americans.

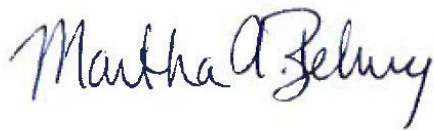
ASN notes that the protocols related to frequency of meals and/or snacking include an asterisk that states: “*Definitions will vary across studies and include occasion-based measures such as meals (e.g., breakfast), snacking, and number of eating occasions.” An asterisk denoting that definitions will vary across studies would also be helpful for other protocols that include terms that have multiple definitions and will likely have variability of evidence because of a lack of consistent definitions, such as depression and ultra-processed foods. While the approach to include all definitions to gather all evidence possible related to these polysemous terms makes sense, it is unclear in the protocol and from the discussion during the second meeting of the DGAC if the terms will then be defined or characterized by the subcommittees or DGAC. It

seems that in order to address each scientific question adequately the subcommittee or DGAC will need to agree on how to define or characterize these terms and concepts after reviewing the evidence and seeing how they are defined throughout the literature in order to conduct systematic reviews, food pattern modeling, and data analysis that most efficiently evaluate the evidence. It would also be useful for the DGAC to capture and provide insights on any challenges defining these terms to help guide and improve the consistency of future research.

ASN welcomes the opportunity to serve as a resource to the DGAC as you move forward with the evaluation of the latest nutrition science and offers our assistance in further defining these terms, if necessary, or in identifying subject matter experts to assist the Committee. 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.

Thank you for the opportunity to comment on the proposed protocols. Please contact Sarah Ohlhorst, MS, RD, ASN's Chief Science Policy Officer [240-428-3647; sohlhorst@nutrition.org], should you have any questions or if ASN may provide additional information.

Sincerely,

A handwritten signature in blue ink that reads "Martha A. Belury". The signature is written in a cursive, flowing style.

Martha A. Belury, PhD, RDN
2022-2023 President, American Society for Nutrition