

September 18, 2013

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RE: **Need for transparency and consistency throughout the Evidence Review Process**

Dear Dr. Olson and Dr. Post:

The members of Dietary Guidelines Industry Coalition<sup>1</sup> who signed this letter respectfully submits comments to the U.S. Department of Health and Human Services (DHHS) and the U.S. Department of Agriculture (USDA) regarding the need for transparency and consistency throughout the Evidence Review Process. Our comments address specific aspects of the process, including the Evidence Based Analysis approach, the formation of research questions and diet modeling.

### **Need for transparency and consistency**

With ever increasing scrutiny of the role of scientific evidence in the formulation of food, nutrition, and health policy, there is need for complete transparency in the process and the tools used to evaluate science. A truly transparent approach in science-based policy making goes beyond the mere adherence to federal statutes such as the Federal Advisory Committee Act (FACA). Moreover, transparency assures that public faith in the recommendations from the Dietary Guidelines Advisory Committee (DGAC) is not weakened by lack of trust in the process.

### **Evidence Based Analysis**

The 2010 DGAC was the first to utilize the Evidence Based Analysis (EBA) approach to generate its recommendations. The Coalition fully supports the EBA approach as it provides an opportunity to

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<sup>1</sup> See attached description of coalition members

integrate research literature on a specific topic in an objective manner. Consistent application of the EBA process in its entirety by each subcommittee, and the option for stakeholders to be involved at every stage supports the objective nature of this process. In the 2010 Dietary Guidelines for Americans (DGA) development process there were key documents utilized in the EBA process that were not transparent or shared in a timely manner. We ask for enhanced transparency and sharing of all materials utilized in the EBA process as they are developed.

### **Formation of Research Questions**

The formation of the research questions is noted to be the most important factor in determining the outcome of systematic evidence-based analysis.<sup>2</sup> The 2010 DGAC developed research questions by reviewing the 2005 DGAC report, determining areas of developing science, concentrating on those with the greatest public health impact, and taking into consideration oral and written public comments.<sup>3</sup> We ask for the public posting of Nutrition Evidence Library questions and products as they are developed, including evidence worksheets, overview tables and evidence summaries. This will allow stakeholders to provide feedback and perspective on this important part of the research process.

### **Diet Modeling**

The practice of food intake modeling started with the 2005 DGAC in response to their research questions and to determine likely effects of possible recommendations on overall dietary adequacy.<sup>4</sup> This practice continued to be part of the 2010 DGA development process and was utilized to address nearly one-third of the 2010 research questions. However, the diet models created were not publically available until after the 2010 DGs were published. Diet modeling has again been discussed by the 2015 DGAC as a tool to be used when answering research questions. Any future diet modeling should be made available publically as it is being developed, so that all stakeholders can better understand the intended application of the modeling in answering research questions and the inputs being used to develop the models. We ask for increased transparency around the research questions, assumptions, and data used to develop the diet models to allow for stakeholder involvement in this process.

The diet modeling practice used in the 2010 DGA utilized the most nutrient dense food option in each category, resulting in recommendations that are more theoretical or idealized versus practical or implementable by consumers. As evidence, the 2010 Journal of Nutrition article by Krebs-Smith et al, found that “nearly everyone fails to meet the Dietary Guidelines.”<sup>5</sup> We recommend utilizing the typical US diet pattern including a variety of foods that are readily available to the general public as the basis

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<sup>2</sup> Achterberberg, C. A Commentary on Evidence-Based Analysis. *Nutr Today*. 2013; 48(4): 153-160.

<sup>3</sup> Spahn J M, Lyon J M, Altman J M, Blum-Kemelor D M, et al. The Systematic Review Methodology Use to Support the 2010 Dietary Guidelines Advisory Committee. *J Am Diet Assoc*. 2011; 111(4): 520-523.

<sup>4</sup> Britten P, Lyon J, Weaver C M, Kris-Etherton P M, Nicklas T A, Weber J A, Davis C A. My Pyramid Food Intake Pattern Modeling for Dietary Guidelines Advisory Committee. *J Nutr Educ Behav*. 2006; 38: S143-S152.

<sup>5</sup> Krebs-Smith S, Guenther P, Subar A, Kirkpatrick S, Dodd K. Americans Do Not Meet Federal Dietary Recommendations. *J Nutr*. 2010; 140: 1832-1838.

for the creation of any diet models. This would provide the public with more realistic opportunities to build a daily diet that better meet the dietary guidelines through small, positive steps.

### **Utilization of Scientific Evidence**

It is the role of the DGAC to translate and distill current science into a set of dietary recommendations from which the DGA are developed. These recommendations must be based upon the weight of scientific evidence combined with strong scientific agreement. We believe that the committee should be encouraged to evaluate new science within the context of the existing science base for the purpose of assessing the need to update or introduce recommendations. We ask that the existence of sufficient evidence and the applicability of existing evidence be considered prior to the initiation of any work to create recommendations. Recommendations based on approaches with insufficient science basis in the case of sustainability, or through the inappropriate application of the science basis in the case of toxicology, reduce the credibility of the DGA and discourage action by the general public.

Thank you for the opportunity to provide comments regarding the 2015 Dietary Guidelines for Americans development process. We look forward to participating in this process.

Sincerely,

Alliance for Potato Research and Education  
American Bakers Association  
American Frozen Food Institute  
American Meat Institute  
Association for Dressings and Sauces  
Calorie Control Council  
Corn Refiners Association  
Grocery Manufacturers Association  
Institute of Shortening and Edible Oils  
International Dairy Foods Association  
Juice Products Association  
National Association of Margarine Manufacturers  
National Confectioners Association  
National Pork Producers Council  
National Restaurant Association  
Snack Food Association  
USA Rice Federation

CC: The Honorable Kathleen Sebelius, Secretary of Health and Human Services

The Honorable Tom Vilsack, Secretary of Agriculture

The Honorable Dr. Howard Koh, Assistant Secretary for Health, U.S. Department of Health and Human Services

The Honorable Kevin Concannon, Under Secretary, Food, Nutrition, and Consumer Services  
U.S. Department of Agriculture