



BIPARTISAN POLICY CENTER

February 7, 2020

Barbara Schneeman, PhD
Chair, 2020 Dietary Guidelines Advisory Committee
c/o Eve Stody, 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

Dear Dr. Schneeman and Members of the 2020 Dietary Guidelines Advisory Committee:

The Bipartisan Policy Center (BPC) appreciates the opportunity to submit comments to the 2020 Dietary Guidelines Advisory Committee (DGAC) as it reviews the evidence and provides recommendations to inform the development of the *Dietary Guidelines for Americans, 2020-2025*. Founded in 2007 by former U.S. Senate Majority Leaders Howard Baker, Tom Daschle, Bob Dole, and George Mitchell, BPC is a non-profit organization that combines the best ideas from both parties to promote health, security, and opportunity for all Americans.

These BPC staff-developed comments reflect staff expertise and input from BPC leaders, experts, and stakeholders from across every sector of health care. They do not represent official positions of BPC's founders or board of directors. Our comments address the 2020 DGAC's evidence review process, priority content areas, and policy implications.

Background

BPC's health program prioritizes bipartisan solutions that advance the health of all Americans, including through improved nutrition. BPC's report [*Lots to Lose: How America's Health and Obesity Crisis Threatens America's Future*](#), provided a comprehensive set of recommendations for addressing childhood obesity, a public health crisis causing high rates of chronic disease, reduced quality of life, and declines in life expectancy. Specific report recommendations related to the Dietary Guidelines include:

- Developing, implementing, and promoting national dietary guidelines for the first thousand days, covering pregnant women and children up to two years old;
- Increasing awareness of the federal diet and physical activity guidelines with an effective national strategy for disseminating this information and educating parents about the benefits of first foods and physical activity, particularly for populations that are most at risk for poor nutrition and health;

- Aligning federal nutrition assistance programs, as well as institutional procurement guidelines both within and outside of the federal government, with the Dietary Guidelines.

Currently, two in five adults and nearly one in five children have obesity.¹ Young children with obesity are more likely to become adolescents with obesity, who are more likely to become adults with obesity.² According to the Centers for Disease Control and Prevention (CDC), having obesity increases the risk for all-cause mortality, high blood pressure, type 2 diabetes, heart disease, stroke, some cancers, reduced quality of life, depression, and anxiety.³ Conversely, good nutrition and healthy habits during the first thousand days (from pregnancy through age two) are essential for supporting children’s long-term health, including growth, brain development, and dietary preferences.^{4, 5}

The impact of the Dietary Guidelines cannot be overstated. By law, all federal food and nutrition policies, programs, and messages must be consistent with the Dietary Guidelines,⁶ and this requirement has a broad impact. For example, the National School Lunch Program alone serves nearly 30 million students on a typical school day.⁷ The WIC Program, which provides nutrition assistance to low-income pregnant and postpartum women, infants, and children up to age 5, has more than 6 million participants a year.⁸ SNAP-Ed, the nutrition education program intended to support better choices for the 34 million Americans who receive food assistance through the Supplemental Nutrition Assistance Program (SNAP),⁹ impacts millions more Americans. In addition, the Dietary Guidelines often serve as a model for non-federal government and private sector food and nutrition policies and programs.

Comments on the 2020 DGAC Evidence Review Process

Overall, BPC is pleased that the DGAC and the U.S. Departments of Agriculture (USDA) and Health and Human Services (HHS) have considered how to improve the DGAC evidence review process based on recommendations from reports of the National Academies of Sciences, Engineering, and

¹ Hales CM, Carroll MD, Fryar CD, and Ogden, CL. Prevalence of Obesity Among Adults and Youth: United States, 2015-2016. NCHS Data Brief No. 288, October 2017.

² Lakshman R, Elks CE, and Ong KK. Childhood Obesity. *Circulation* 2012;126:1770–1779. <https://doi.org/10.1161/CIRCULATIONAHA.111.047738>.

³ CDC. Adult Obesity Causes & Consequences. Updates February 4, 2020. Available at <https://www.cdc.gov/obesity/adult/causes.html>. Accessed February 4, 2020.

⁴ Cusick S and Georgieff MK. The First 1,000 Days of Life: The Brain’s Window of Opportunity. Unicef. Available at <https://www.unicef-irc.org/article/958-the-first-1000-days-of-life-the-brains-window-of-opportunity.html>. Accessed February 5, 2020.

⁵ Thousand Days. Nutrition in the First 1,000 Days: A Foundation for Lifelong Health. 2019. Available at https://thousanddays.org/wp-content/uploads/1_000Days-Nutrition-Lifelong-Health-FINAL.pdf. Accessed February 5, 2020.

⁶ National Nutrition Monitoring and Related Research Act (PL 101-445). Title III, Sec. 301: Establishment of Dietary Guidelines.

⁷ USDA, Food and Nutrition Service. National School Lunch Program: Participation and Lunches Served. As of January 3, 2020. Available at <https://fns-prod.azureedge.net/sites/default/files/resource-files/slsummary-1.pdf>. Accessed February 4, 2020.

⁸ USDA, Food and Nutrition Service. WIC Program Participation and Costs. As of January 3, 2020. <https://fns-prod.azureedge.net/sites/default/files/resource-files/wisummary-1.pdf>. Accessed February 4, 2020.

⁹ USDA, Food and Nutrition Service. Supplemental Nutrition Assistance Program Participation and Costs. As of January 3, 2020. Available at <https://fns-prod.azureedge.net/sites/default/files/resource-files/SNAPsummary-1.pdf>. Accessed February 4, 2020.

Medicine [Committee on the Review of the Process to Update the Dietary Guidelines](#). In particular, we appreciate the steps that have been taken to provide transparency, such as publicly posting the research protocols and meeting summaries, and ensure the scientific integrity of the process, including incorporating peer review of the Nutrition Evidence Systematic Review (NESR) team's systematic reviews into the process. We are pleased that the DGAC's review of the evidence has remained largely scientific and non-partisan.

However, we have concerns that the DGAC will only base its conclusions and recommendations on the systematic reviews conducted by the NESR staff at USDA and not existing systematic reviews and meta-analyses conducted by researchers and experts outside the federal government. This departure from previous Committees' approaches reduces the efficiency and effectiveness of the Committee's work and likely contributed to the challenges that several DGAC subcommittees are facing in not being able to complete systematic reviews for all of their research questions before the deadline for completion of the report. It was noted at the DGAC's January 23-24, 2020 public meeting that many of the subcommittees must prioritize which of the remaining research questions will be addressed by a new or updated NESR review because there is not enough time to complete the reviews for all remaining research questions. If the DGAC had utilized the many high-quality systematic reviews and meta-analyses conducted by researchers outside the federal government that address the 2020 DGAC's research questions, the Committee may have been able to review the evidence and provide up-to-date conclusions and recommendations for a greater number of topics related to diet and health. The DGAC should consider relying on high-quality reviews conducted by outside researchers and organizations for topics on which the DGAC will not be able to complete its own review.

In addition, as several DGAC members implied at the January 23-24, 2020 public meeting, the framing and phrasing of the research questions by USDA and HHS prior to selection of the DGAC members does not always align with the way the issues are addressed in the research and may have limited the DGAC's ability to provide conclusions and recommendations that are evidence-based and relevant. We also share this concern and suggest that the DGAC be given latitude to make minor adjustments to the research questions, as needed, based on their professional expertise to allow them to reach timely, relevant conclusions of interest to the public and that are important for informing federal policy and programs.

Despite the DGAC basing conclusions and recommendations solely on the results of NESR reviews, we appreciate that the DGAC will acknowledge in its report how conclusions and recommendations do or do not align with those of other experts and organizations.

Comments on the 2020 DGAC Report Content

BPC supports the DGAC taking a life course approach and emphasizing good nutrition across the lifespan. While the Dietary Guidelines are tailored to a healthy adult population, the DGAC should acknowledge that nearly half (45%) of US adults have one or more chronic diseases, such as heart

disease, stroke, cancer, or type 2 diabetes,¹⁰ and provide recommendations that are appropriate to this population.

We are pleased that, for the first time, the DGAC will review the evidence and provide conclusions and recommendations regarding nutrition for infants and toddlers up to age 2 and increase focus on nutrition during pregnancy and lactation. As noted previously, the first thousand days from pregnancy through age two are a critical period of growth and development.^{11, 12} Dietary intake and habits established during this time period can have significant implications for both short- and long-term health, including growth, brain development, and dietary preferences. Women's nutrition and health during pregnancy and lactation helps to shape the well-being of the next generation. Pregnant and lactating women and parents of children under age two need evidence-based guidance on what and how to eat for improved nutrition and health for themselves and their children. We suggest that the DGAC provide conclusions and recommendations based on the best available evidence, even if there are gaps in research. On topics for which there is insufficient evidence to reach a conclusion, the DGAC should make specific recommendations for further research.

The 2020 DGAC should maintain and reinforce conclusions reached by the 2015 DGAC regarding the components of a healthy dietary pattern. The 2015 DGAC concluded (p. 2-3): "The overall body of evidence examined by the 2015 DGAC identifies that a healthy dietary pattern is higher in vegetables, fruits, whole grains, low- or non-fat dairy, seafood, legumes, and nuts; moderate in alcohol (among adults); lower in red and processed meat; and low in sugar-sweetened foods and drinks and refined grains."¹³ As the evidence regarding the importance of increasing or limiting these dietary components has only strengthened in the past five years, the 2020 DGAC should reach a similar conclusion. Consistent with the evidence, the DGAC's conclusions and recommendations should emphasize an overall dietary pattern rather than specific foods or nutrients.

Policy Implications

While the DGAC is primarily tasked with reviewing the evidence, it should acknowledge and consider its impact on federal policy. The DGAC's conclusions and recommendations are intended to inform the development of the Dietary Guidelines, which as noted previously, forms the basis of all federal food and nutrition policies and programs. For example, the addition of added sugars

¹⁰ National Association of Chronic Disease Directors. Why Public Health Is Necessary to Improve Healthcare. Available at https://cdn.ymaws.com/www.chronicdisease.org/resource/resmgr/white_papers/cd_white_paper_hoffman.pdf. Accessed February 4, 2020.

¹¹ Cusick S and Georgieff MK. The First 1,000 Days of Life: The Brain's Window of Opportunity. Unicef. Available at <https://www.unicef-irc.org/article/958-the-first-1000-days-of-life-the-brains-window-of-opportunity.html>. Accessed February 5, 2020.

¹² Thousand Days. Nutrition in the First 1,000 Days: A Foundation for Lifelong Health. 2019. Available at https://thousanddays.org/wp-content/uploads/1_000Days-Nutrition-Lifelong-Health-FINAL.pdf. Accessed February 5, 2020.

¹³ Dietary Guidelines Advisory Committee. 2015. *Scientific Report of the 2015 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Health and Human Services and the Secretary of Agriculture*. U.S. Department of Agriculture, Agricultural Research Service, Washington, DC.

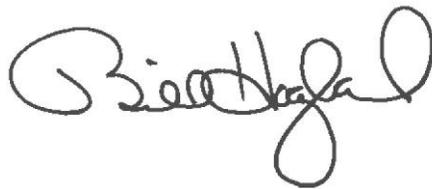
content and a percent daily value to the Nutrition Facts label was only possible after the 2015 DGAC recommended reducing consumption of added sugar and provided a quantitative limit. In addition, nutrition standards for school meals and other federal nutrition programs like the Child and Adult Food Care Program (CACFP) must be consistent with the guidelines.

To support people in meeting the guidelines, the DGAC should acknowledge and address that the environment in which we live impacts people's abilities to make healthy choices. For example, highly-processed foods high in calories, fats, and added sugars are cheap and abundant and heavily marketed. The average score on the Healthy Eating Index, a marker of how well Americans are following the Dietary Guidelines, has remained consistently low (ranging between 56 to 60 out of 100) since 2005.¹⁴ Coordinated, targeted education campaigns and comprehensive changes in policies at all levels that address the obesogenic environment are needed to make it easier for people to follow the Dietary Guidelines.

Conclusion

In conclusion, we appreciate the opportunity to provide comments to the DGAC and look forward to reviewing the Committee's report. If we can provide additional information, please contact Melissa Maitin-Shepard, Nutrition Policy Consultant, at mmaitinshepard@gmail.com, or alternatively contact my office at the BPC at (202) 637-7918.

Sincerely,

A handwritten signature in black ink, appearing to read "G. William Hoagland". The signature is fluid and cursive, with a large initial "G" and a long, sweeping underline.

G. William Hoagland
Senior Vice President
Bipartisan Policy Center

¹⁴ USDA, Food and Nutrition Service. HEI Scores for Americans. January 2019. Available at <https://www.fns.usda.gov/hei-scores-americans>. Accessed February 5, 2020.