FOOD AND NUTRITION BOARD

Redesigning the Process for Establishing the Dietary Guidelines for Americans

EMBARGOED UNTIL SEPTEMBER 14, 2017 AT 11AM ET
BACKGROUND

• Dietary guidance has evolved over time from being focused on reducing inadequate or excessive intakes of food, nutrients, and calories to now include the goal of reducing risk of chronic disease.

• Updates in nutrition science and innovations in methods have improved the process for developing dietary guidance
  – use of systematic reviews
  – food pattern modeling
  – less reliance on the collective knowledge/opinion of experts.
THE DIETARY GUIDELINES FOR AMERICANS

• The DGA provides nutritional and dietary information for the purpose of promoting health and preventing disease.

• As mandated by Congress, USDA and HHS jointly update and present the DGA every 5 years.

• The DGA serves as the basis for all federal nutrition policies, nutrition assistance programs, and nutrition education and advice for the public.
The Dietary Guidelines for Americans

- **DGA** must be based on the “preponderance of the scientific and medical knowledge which is current at the time the report is prepared.” (National Nutrition Monitoring and Related Research Act)
  - Four types of analyses currently used include (1) original systematic reviews; (2) existing systematic reviews, meta-analyses, and reports; (3) food pattern modeling; and (4) descriptive data analyses

- USDA and HHS convene the Dietary Guidelines Advisory Committee, which operates on a 2 year time limit under the Federal Advisory Committee Act to evaluate the scientific evidence.
THE DIETARY GUIDELINES FOR AMERICANS

• The DGAC’s conclusions are submitted to the secretaries of USDA and HHS as the Scientific Report of the Dietary Guidelines Advisory Committee.

• A federal writing team then develops the DGA based on the conclusions in the Scientific Report of the Dietary Guidelines Advisory Committee.
(1) How the advisory committee selection process can be improved to provide more transparency, eliminate bias, and include committee members with a range of viewpoints
The secretaries of USDA and HHS should employ an external third party to review and narrow the candidate pool to a list of primary and alternate nominees. Criteria against which nominees are screened should be developed by USDA and HHS for use by the third party.
The secretaries of USDA and HHS should make a list of provisional appointees open for public comment—including short biographies and any known conflicts—for a reasonable period of time prior to appointment.
BIASES & CONFLICTS OF INTEREST - RECOMMENDATION

The secretaries of USDA and HHS should disclose how provisional nominees’ biases and conflicts of interest are identified and managed by:

a. Creating and publicly posting a policy and form to explicitly disclose financial and nonfinancial biases and conflicts;

b. Developing a management plan for addressing biases and conflicts for the panel as a whole and individuals, as needed;

c. Certifying that a federal ethics officer independently reviewed and judged the advisory committee’s biases and conflicts of interest

d. Documenting how conflicts of interest were managed in the Dietary Guidelines Advisory Committee report.
CONTINUOUS LEARNING - RECOMMENDATION

The secretaries of USDA and HHS should adopt a system for continuous process improvement to enhance outcomes and performance of the Dietary Guidelines Advisory Committee selection process.
(2) How the Nutrition Evidence Library (NEL) is compiled and utilized, including whether the NEL reviews and other systematic reviews and data analysis are conducted according to rigorous and objective scientific standards;

(3) How systematic reviews are conducted on long-standing DGA recommendations, including whether scientific studies are included from scientists with a range of viewpoints; and

(4) How the DGA can better prevent chronic disease, ensure nutritional sufficiency for all Americans, and accommodate a range of individual factors, including age, gender, and metabolic health.
KEY FINDINGS AND CONCLUSIONS

• The process to update the DGA should be redesigned to allow for the appropriate expertise and time to focus on each step of the process, which can be achieved by reallocating the steps to diverse, targeted groups of experts.

• Greater transparency is needed to produce trustworthy dietary guidelines and provide assurances that decisions are not tainted by bias or undue influence.

• While the current methods used in the DGA process are appropriate for the questions being asked, methods must continually be strengthened and advanced.
EVIDENCE WE REVIEWED

• Processes of other guideline-forming bodies

• Literature reviews

• USDA listening sessions, invited speakers, and public comments
PURPOSES AND AUDIENCES

• The purposes and audiences of the DGA needs to be clarified.

• Proposed purpose statement:
  The purpose of the DGA is to provide science-based “nutritional and dietary information and guidelines for the general public” that form the basis for “any federal food, nutrition, or health program” (based on the National Nutrition Monitoring and Related Research Act)

• Proposed audience: general public

• Goals of the guidelines:
  – Promote dietary intake that helps improve health and reduce the risk of chronic disease.
  – Provide the federal government with a consistent approach for nutrition policy and messaging.
CURRENT PROCESS

STEP 1  MONTHS 0-27
USDA and HHS complete administrative tasks and appoint Dietary Guidelines Advisory Committee

STEP 2  MONTHS 27-48
Dietary Guidelines Advisory Committee reviews science and produces an advisory report

STEP 3  MONTHS 48-60
USDA and HHS solicit and review comments on the advisory report from the public (months 48–50) and federal agencies

STEP 4  MONTHS 50-60
USDA and HHS update and release the Dietary Guidelines for Americans
VALUES TO ENHANCE INTEGRITY

1. Enhance transparency

2. Promote diversity of expertise and experience

3. Support a deliberative process (including being adaptive and flexible, continuous, and supportive of continuous learning)

4. Manage biases and conflicts of interest

5. Adopt state-of-the-art processes and methods
# Proposed Process

## DGA Cycle (months)

### Process Redesign Model

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- **(release DGPCG report)**
- **(release DGSAC report)**
- **(release DGA)**

- **DGPCG**
  - Ongoing surveillance
  - Subcommittees (as needed)
  - Federal staff and TEPs as needed to support all types of analyses

- **Selection**
  - DGPCG
  - Subcommittees

- **DGSAC**

- **USDA/HHS update DGA**

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- **(release DGA)**
- **(release DGAC report)**
- **(release DGA)**

- **Selection**
  - DGAC (topics, questions, evaluation)
  - Federal staff support

- **USDA/HHS update DGA**
RECOMMENDATION 1

The secretaries of the U.S. Department of Agriculture (USDA) and the U.S. Department of Health and Human Services (HHS) should redesign the DGA process to prioritize topics to be reviewed in each DGA cycle, and redistribute the current functions of the Dietary Guidelines Advisory Committee to three separate groups:

a. Dietary Guidelines Planning and Continuity Group to monitor and curate evidence generation, to identify and prioritize topics for inclusion in the DGA, and to provide strategic planning support across DGA cycles;

b. Technical expert panels to provide content and methodological consultation during evaluation of the evidence; and

c. Dietary Guidelines Scientific Advisory Committee to interpret the scientific evidence and draw conclusions.
# Proposed Process

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|        |        |        |        |        |
| Selection | DGAC (topics, questions, evaluation) | Federal staff support | | USDA/HHS update DGA |
TRANSPARENCY AND PARTICIPATION NEEDED

Transparency and participation are needed to help build trust in the overall process, particularly:

– Topic identification, selection, and prioritization
– Data collection and evaluation
– Data synthesis, interpretation, and integration
– Development of *DGA Policy Report* by the federal writing team
RECOMMENDATION 2

The secretaries of USDA and HHS should provide the public with a clear explanation when the DGA omit or accept only parts of conclusions from the scientific report.
STRENGTHENING SYSTEMATIC REVIEWS

- **Original systematic reviews:** those who synthesize and interpret the evidence and formulate conclusions ought to not be leading the development of the systematic review protocol and selection of studies.

- **Existing systematic reviews, meta-analyses, and reports:** generally appropriate and encouraged, but existing studies need to be relevant, timely, and of high quality.

- **NEL needs to adopt a single systematic review protocol that is transparent and follows state-of-the-art methods.**
RECOMMENDATION 3

The secretary of USDA should clearly separate the roles of USDA Nutrition Evidence Library (NEL) staff and the Dietary Guidelines Scientific Advisory Committee (DGSAC) such that:

a. The NEL staff plan and conduct systematic reviews with input from technical expert panels, perform risk-of-bias assessment of individual studies, and assist the DGSAC as needed.

b. The NEL systematic reviews are externally peer reviewed prior to being made available for use by the DGSAC.

c. The DGSAC synthesizes and interprets the results of systematic reviews and draws conclusions about the entire body of evidence.
RECOMMENDATION 4

The secretary of USDA should ensure all Nutrition Evidence Library (NEL) systematic reviews align with best practices by:

a. Enabling ongoing training of the NEL staff,
b. Enabling engagement with and learning from external groups on the forefront of systematic review methods,
c. Inviting external systematic review experts to periodically evaluate the NEL’s methods, and
d. Investing in technological infrastructure.
STRENGTHENING ANALYSES

• Food pattern modeling: useful for elucidating relationships among food group nutrient profiles, nutrient goals, and energy constraints, but currently only able to answer limited range of questions

• Descriptive data analyses: generally appropriate, but are limited by availability of current data

• All analyses need to be conducted earlier in the DGA process to be of more use to the DGSAC
The secretaries of USDA and HHS should enhance food pattern modeling* to better reflect the complex interactions involved, variability in intakes, and range of possible healthful diets.

*Food pattern modeling is a type of sensitivity analysis used to incorporate various data inputs, constraints, goals, and assumptions to inform food patterns and resulting nutrient profiles, as well as to answer various questions regarding the effects of modifications to food patterns.
RECOMMENDATION 6

The secretaries of USDA and HHS should standardize the methods and criteria for establishing nutrients of concern.*

*A nutrient of concern is a nutrient that is under- or overconsumed by the U.S. population and/or select population group, as categorized by the DGAC.
ADVANCING METHODS USED

• The *DGA* can play a key role in advancing the understanding of the role of diet within the larger body of evidence on factors that affect health.

• Systems maps and models can lead to new insights and advance knowledge of the pathways connecting diet and health.
RECOMMENDATION 7

The secretaries of USDA and HHS should commission research and evaluate strategies to develop and implement systems approaches into the DGA. The selected strategies should then begin to be used to integrate systems mapping and modeling into the DGA process.
COMMITTEE TO REVIEW THE PROCESS TO UPDATE THE DIETARY GUIDELINES FOR AMERICANS

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For More Information

The full report can be found at www.nas.edu/dgareview