

As the food and nutrition leaders representing the of the Academy of Nutrition and Dietetics and the American Society for Nutrition, we ask for your support of the 2015 Dietary Guidelines process to continue without interference by Congress. We are concerned that the proposed language in the House's Departments of Agriculture, Rural Development, Food and Drug Administration and Related Agencies (section 734) and Departments of Labor, Health and Human Services and Education and Related Agencies,(section 232) Fiscal Year 2016 Appropriations Bills will halt the progress of this important nutrition policy that could improve public health.

The *Dietary Guidelines for Americans* are founded in evidence-based science and should be insulated as much as possible from political influences. The Nutrition Evidence Library (NEL) was launched in July 2008 by the Department of Agriculture's Center for Nutrition Policy and Promotion. The NEL was built as an outgrowth from the Academy of Nutrition and Dietetics' Evidence Analysis Library (EAL), developed in 2004. The NEL mirrors the Academy's EAL but specializes in systematic reviews to inform federal nutrition-related policies and programs. The NEL conducts systematic reviews on food and nutrition-related topics by using a rigorous, transparent and reproducible methodology to support federal nutrition policies and programs. This process includes:

- Developing specific research questions on diet and health
- Developing corresponding search plans for literature review designed to answer the research questions
- Extracting data from existing literature as directed by the search plans
- Developing conclusion statements to answer each question and grading the strength of evidence supporting the conclusion.

A conclusion can be graded Strong, Moderate, Limited or Grade Not Assignable. The Strong rating is reserved for bodies of evidence completely free from study design concerns or disagreements between findings, which is rare. Science and statistics expect a small number of contrary findings and it is the "preponderance of evidence" that can overcome limitations of individual studies. As a result, recommendations with a Moderate rating, which indicates a sizable body of well-designed research with which the Dietary Guidelines Advisory Committee (DGAC) had no more than minor doubts, are more than sufficient to develop the *Dietary Guidelines for Americans*. The exclusion of recommendations with a Moderate rating would eliminate several uncontested truths from the record available to USDA and HHS and interfere with helping Americans consume a healthy diet.

Nutrition-focused systematic reviews draw on several types of methodologies, not just randomized clinical trials. The reason for this lack of randomized clinical trials in nutrition is multifaceted, but, most important, people must eat to survive and pure control groups are ethically difficult. Large clinical trials are also very costly and take many years to complete. Fortunately, new research methods are becoming

acceptable to study key research questions relating to the health of the population, which will hopefully enhance nutrition related research. Currently, the published food and nutrition research, which has been funded by government, foundations and industry, is a mixture of randomized controlled trials and observational studies which include prospective cohort and case-control studies. The NEL and the DGAC utilized only randomized controlled trials and prospective cohorts and did not consider results from case-control studies due to the potential for bias or weaker designs such as case reports or ecological studies. If we are to continue to guide the American population on healthy eating choices to prevent disease and have optimal health, we must accept recommendations that are rated less than Strong. The DGAC's scientific conclusions and HHS/USDA's final development of the *Dietary Guidelines* use more than one question or source of evidence, such as NEL systematic reviews. The DGAC also conducted *de novo* data analysis using data from our national nutrition surveillance system (the National Health and Nutrition Examination Survey, NHANES) and reviewed evidence using a process known as food pattern modeling, which is used to describe the combination of foods and drinks a person should consume to meet nutrient needs without exceeding calorie intake to maximize health benefits and reduce risk of diet-related chronic disease. The final *Dietary Guidelines for Americans* will consider all this information.

Nutrition, like all sciences, evolves with new research and information. A lack of evidence or limited evidence for one specific question does not mean that there is not strong evidence to support guidance. The *Dietary Guidelines* will continue to be developed on the preponderance of the strongest available evidence available at the time. Limited or Moderate evidence for one health outcome could greatly limit the ability to provide guidance on dietary patterns when the evidence may be Strong for other health outcomes. Using the cutoff of "Strong" will significantly limit the ability to develop recommendations across the *Dietary Guidelines* and could therefore undermine advances in improving public health.

We ask that the House's Departments of Agriculture, Rural Development, Food and Drug Administration and Related Agencies (section 734) and Departments of Labor, Health and Human Services and Education and Related Agencies, (section 232) Fiscal Year 2016 Appropriations Bills not be included in the final spending package for Fiscal Year 2016 based on their current language regarding the *Dietary Guidelines for Americans*.

We would be glad to discuss this request further. Please feel free to connect Alison Steiber PhD, RDN, Chief Science Officer of the Academy of Nutrition and Dietetics, at [asteiber@eatright.org](mailto:asteiber@eatright.org) or Mary Pat Raimondi Vice President at [mraimondi@eatright.org](mailto:mraimondi@eatright.org) with your questions.

Thank you for your consideration.

Respectfully,  
Academy of Nutrition and Dietetics  
American Society for Nutrition