

Recommendations for the National Academy of Medicine’s review of the Process to Update the Dietary Guidelines for Americans, 2015–2020

The Center for Science in the Public Interest (CSPI) is a non-profit consumer education and advocacy organization that since 1971 has been working to improve the public’s health through better nutrition and food-safety policies. CSPI’s work is supported primarily by the 650,000 subscribers to its *Nutrition Action Healthletter*, the nation’s largest-circulation health newsletter. CSPI is an independent organization that does not accept any government or corporate funding.

CSPI appreciates the opportunity to offer recommendations to the National Academy of Medicine’s review of the process for establishing the Dietary Guidelines for Americans. Since the inception of the DGA, CSPI has actively participated in the process of developing and updating the Guidelines by nominating members of the Dietary Guidelines Advisory Committee, offering public comment during the DGAC deliberations, commenting on the DGAC report, and publicizing the DGAs themselves. CSPI nominated candidates for the 2015–2020 Dietary Guidelines Advisory Committee (DGAC), and some of them were selected to participate on the final committee. CSPI generally supports the Scientific Report of the 2015 DGAC, which was strong, comprehensive, and evidence-driven. While we believe that the 2015 DGAC report and resulting DGA served the nation’s health well, CSPI makes the following recommendations to improve the process of selecting the advisory committee and generating the Guidelines:

- Make financial conflict-of-interest information regarding provisionally appointed committee members publicly available and allow the public to comment before members are formally appointed;
- Create more transparency in the process of applying the Scientific Report to the final guidelines by requiring explanations for why specific recommendations were omitted or changed significantly; and,
- Include clear, salient, evidence-based recommendations in both the DGAC report and final DGA for corporate and institutional activities and state, local, and federal policies.

Here are our responses to the specific issues that the NAM’s review will address in its short report.

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*

CSPI believes the 14 DGAC members for the 2015 edition were well-qualified scientists with expertise in a wide range of topics including the prevention of chronic diseases (e.g., cancer, cardiovascular disease, type 2 diabetes, obesity, osteoporosis), exercise, epidemiology, gerontology, pediatrics, maternal nutrition, public health, and systematic review methodology.¹ Indicative of the members' expertise and stature, eight of the DGAC members had served or currently serve on a committee of the NAM. In fact, four of the twelve members of the NAM's Food and Nutrition Board served on the DGAC in 2015.

The 2015 and previous DGACs have included nutrition experts representing a range of viewpoints. The committee selection process used by HHS/USDA is similar to the National Academies' committee-selection process (see Table below). Both processes offer an opportunity for public comment, collection of conflict-of-interest and other relevant background information, and establishment of the final committee by the Departments or Academies. One notable difference, however, is that the Academies require public conflict-of-interest disclosure before the committees are finalized. Following the standards set forth by the NAM to eliminate bias, CSPI recommends that the Departments disclose provisional members' conflict-of-interest information and allow the public to comment on the provisional members in light of that (and other) information.

Dietary Guidelines Advisory Committee Selection Process with CSPI Recommendation	NAM Committee Selection Process
Nominations are sought from the public through a Federal Register notice.	Nominations are solicited from "a wide range of sources."
The nominations are reviewed to establish the committee.	A provisional committee is established by the Academies and approved by the president of the National Academy of Sciences.
Conflict-of-interest forms are collected by the Departments and reviewed. <i>CSPI recommends that these forms be made available to the public with an opportunity for public comment.</i>	The provisional committee members submit conflict-of-interest information. If a conflict is determined, a waiver is made and it is made public and comment sought.
The Secretaries of USDA and HHS jointly appoint individuals for membership to the DGAC.	The final committee is formally approved.

The NAM's policies to address financial conflicts of interest offer an example for future DGAC selection. The NAM's public policies indicate that, "no individual can be appointed to serve (or continue to serve) on a committee of the institution used in the

development of reports if the individual has a conflict of interest that is relevant to the functions to be performed.”² The NAM defines a conflict of interest as “any financial or other interest which conflicts with the service of the individual because it could significantly impair the individual’s objectivity or could create an unfair competitive advantage for any person or organization.” However, in cases when a conflict is said to be unavoidable, NAM identifies the conflict through a waiver with an opportunity for public comment. CSPI recommends that the Departments follow a similar process in selecting the members of the DGAC. Conflicts of interest would not necessarily preclude an individual from participating on the committee, if he or she offered a truly unique expertise needed by the committee.

To add more transparency to the process of developing the final guidance, CSPI recommends that the Departments respond to the Scientific Report of the DGAC and comment on any recommendations that were significantly modified or not included in the final report. For instance, the 2015 DGAC’s review of the evidence found “Strong” associations between dietary patterns high in red and processed meats and increased risk of cardiovascular disease, as well as “Moderate” associations between colorectal cancer, measures of body weight or obesity, and type 2 diabetes. Further, the International Agency for Research on Cancer concluded in November 2015 that processed meats are “carcinogenic to humans” and red meats are “probably carcinogenic to humans,” citing evidence that was available when the Dietary Guidelines for Americans (published in December 2015) was being written.³ Despite that evidence, the 2015 DGA did not include a recommendation to lower consumption of red and processed meat, except for teenaged and adult males.

It is important to realize that the changes needed in our diet to improve public health cannot be done just by individuals. Institutional and food-environment changes also must be instituted to accelerate reductions in chronic diseases related to diet. As seen in the recent CSPI report card on the American diet (based on USDA consumption data), despite all the previous Dietary Guidelines, the American diet has changed only slowly in the healthy direction.⁴ Therefore, both the DGAC Scientific Report and the final DGA should include clear, actionable, and evidence-based recommendations for institutional actions and government policies.

Lastly, the 2015 DGAC limited member bias by employing rigorous, scientific standards to the process of reviewing and synthesizing the evidence. The DGAC employed consistent methodology throughout the process of selecting and reviewing the evidence, including clear inclusion and exclusion criteria determined a priori “to ensure that each study included the appropriate population, intervention/exposure, comparator(s), and outcomes.” Those steps were taken to ensure that all evidence was considered fairly and objectively to the greatest extent possible and that the process could be reproduced by other reviewers.

¹ For more detailed information on the make-up of the DGAC, please visit:

<http://health.gov/dietaryguidelines/committee/>

² National Academies of Sciences, Engineering, and Medicine. Our Study Process.

<http://www.nationalacademies.org/studyprocess/>

³ World Health Organization: International Agency for Research on Cancer. 2016. IARC Monographs evaluate consumption of red and processed meat. http://www.iarc.fr/en/media-centre/pr/2015/pdfs/pr240_E.pdf

⁴ Liebman, Bonnie. The Changing American Diet: A Report Card. 2016. Center for Science in the Public Interest. <https://cspinet.org/resource/changing-american-diet-0>.