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**Oral Testimony on the Process to Develop the 2020 Dietary Guidelines for Americans
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Policy**

The American Society for Nutrition (ASN), a global scientific, professional society of nutrition scientists and researchers, appreciates the opportunity to comment on the process to develop the 2020 Dietary Guidelines for Americans (DGAs).

ASN supports the inclusion of several important concepts from the recent National Academies' reports on Redesigning the DGA Process. Incorporating recommendations for a strong evidence-based approach to inform DGA development and to increase transparency and allow for public input at more stages of the process is crucial. ASN agrees that the Departments should prioritize topics for review and seek public input to do so, although the scientific evidence base should be the final determinant to guide which topics require updates. ASN recognizes that several of the DGA recommendations have been consistent over time and are unlikely to change in the absence of a new body of evidence; priority should be given to areas to be included in the DGAs for which new evidence is available.

ASN recommends using the term Dietary Guidelines Scientific Advisory Committee (DGSAC) to be clear on their primary responsibility. ASN supports the recommendation that a third party be used to select a pool of qualified candidates from which the HHS and USDA Secretaries can appoint the DGSAC, but recognizes it may be difficult to implement for 2020.

ASN is cautious of making the provisional 2020 DGSAC appointments publically available, if the process encourages *ad hominem* attacks and discourages participation by otherwise highly-qualified experts. The purpose and scope of comments on the provisional committee must be clearly defined to assure the intent is to validate balance and expertise. ASN acknowledges the careful vetting of COIs that has been done in the past, and would support the development and use of a more transparent process to disclose, vet and manage financial and nonfinancial COIs as the DGSAC and topic-specific focus groups are formed, as well as throughout the entire process.

ASN supports the identification of key topics to be updated by a core DGSAC, followed by the use of tailored, more focused expert groups to conduct systematic reviews of the evidence for key topics, such as nutrition guidelines for birth to 24 months of age and pregnant women.

ASN supports rigorous systematic review and evaluation of the scientific evidence by scientific experts in food, nutrition, and health research and policy. ASN agrees that food pattern modeling methodology needs to be improved to be more effective in developing dietary patterns that better reflect the heterogeneity of the U.S. population and meet the population's varying needs. The definition of 'nutrients of concern' should also be standardized so there is

consistency across DGA cycles. Following the 2020 DGAs, it will be important to ensure continuity between DGA cycles.

ASN appreciates the efforts of USDA and HHS to remain transparent, data driven, and science-based throughout the process to establish the 2020 DGAs.