

**Comments of  
Tia Rains, Executive Director  
Egg Nutrition Center  
Before the  
2020 Dietary Guidelines for Americans Listening Session  
November 28, 2017**

On behalf of the Egg Nutrition Center, thank you for this opportunity. ENC is a team of food and nutrition experts; our primary function is to fund and monitor nutrition research on eggs and egg-related nutrients and interpret new research findings. We translate this information to health practitioners and consumers and educate on how eggs fit within the healthy dietary patterns recommended in the Dietary Guidelines for Americans.

Our comments today are primarily focused on transparency and the rigor of the scientific review process.

The recent National Academies report on the Dietary Guidelines process places a strong emphasis on the need to apply an objective and consistent set of standards and to create separation between the identification of topics for review and subsequent interpretation of the evidence. It is important to understand how research is identified and considered for review, including the relevant selection criteria, such that researchers might bring forward other studies that meet these criteria or conduct new research that adheres to such principles.

Users of the guidelines and the advisory report will benefit from a clear understanding of the approach for evaluating scientific evidence and the relative rigor of the evidence base and how such evidence is applied to the strength grades. This includes describing the standards by which the grades of strong, moderate or weak are assigned – so that the reader can have confidence that recommendations genuinely represent how compelling the science is behind a particular topic.

Due to the nature of nutrition science, it will sometimes be necessary to rely on observational studies in circumstances where randomized controlled trials, the gold standard, are not practical or possible. Understanding how observational

data is translated into evidentiary grades, compared to topics with randomized controlled trial evidence, is important in a transparent process.

The National Academies recommended that the government disclose the rationale when the final guidelines differ from advisory committee recommendations. Transparency around the principles that are applied in such instances ensures the scientific rigor of the entire guidelines process.

For the 2020 committee, there will clearly be a need for a diverse set of experts, including those with an understanding of infants, toddlers and pregnant women. Concepts unique to these populations, such as introduction of food allergens during early feeding, will require additional expertise.

A committee that is diverse not only in expertise but also in geography, institutional affiliation and life experience may provide a richer mix of scientific discussion and deliberation. In addition, a history of changing one's mind when the scientific evidence evolves is a valuable quality in an advisory committee member.

Finally, the report recommended that the government utilize a third party to initially vet nominations received from the public. Should the government choose to follow this recommendation, it would become relevant to consider the composition of that third party and how individuals will be identified for that committee, in addition to ensuring the committee operates in a transparent manner and is free from bias or conflicts of interest.

Thank you for the opportunity to speak with you, and thank you as well for your important work on dietary guidance.