



American Society for Nutrition
Excellence in Nutrition Research and Practice

February 6, 2025

Janet M. de Jesus, MS, RD
Designated Federal Officer
Office of Disease Prevention and Health Promotion
U.S. Department of Health and Human Services (HHS)
1101 Wootton Parkway, Suite 420
Rockville, MD 20852

Re: Docket No. HHS-OASH-2024-0017; Comments on the Scientific Report of the 2025 Dietary Guidelines Advisory Committee (DGAC)

To the Secretaries of HHS and the U.S. Department of Agriculture (USDA):

The American Society for Nutrition (ASN) appreciates the opportunity to provide oral and written comments to HHS and USDA on the Scientific Report of the 2025 DGAC, as you consider the scientific basis for the 2025-2030 Dietary Guidelines for Americans (DGAs). ASN is a scientific, professional society with more than 8,000 professional members across 100 countries worldwide who conduct research to achieve “A Healthier World Through Evidence-Based Nutrition.” ASN applauds the important contributions of the many ASN members that led to this report, including those who served on the 2025 DGAC, or contributed to writing and reviewing the Scientific Report that will be used to craft the 10th edition of the DGAs.

ASN also acknowledges the seminal work of the various working groups assessing alcoholic beverages and health, including the National Academies of Sciences, Engineering, and Medicine, the Surgeon General, and the Interagency Coordinating Committee on the Prevention of Underage Drinking, as well as the various working groups addressing climate change and nutrition. ASN urges HHS and USDA to consider carefully and utilize the findings of these various reports for translation into the 2025-2030 DGAs. As HHS and USDA translate the Scientific Report of the 2025 DGAC and other key reports and guidance into the 2025-2030 DGAs, it is important to be transparent by providing the scientific evidence-informed rationale for the final recommendations in the Guidelines, and when there was more than one option, clearly explaining why other options were not chosen.

ASN appreciates the Committee’s inclusion of strategies meant to enable Americans to achieve healthy dietary patterns to achieve a healthy weight and reduce obesity and diet-related chronic disease risks that the Secretaries should incorporate into the 2025-2030 DGAs. ASN commends the Committee for using diet simulations for the first time and applying an approach that emphasizes how their recommendations, including healthy dietary patterns, will allow Americans to consume a wide range of foods and beverages to meet nutrient needs in a variety of ways that best suit their lifestyles. As such, ASN supports the DGAC’s proposed Eat Healthy Your Way Dietary Pattern—a single inclusive, flexible, dietary pattern that incorporates scientific evidence accumulated across many years and builds on the work of prior Committees.

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As suggested by the DGAC, ASN urges the government to strengthen nutrition surveillance systems, and to continue updates of the Dietary Reference Intakes (DRIs). The National Health and Nutrition Examination Survey (NHANES) is the only nationally representative survey that provides a unique and critically important surveillance function in which dietary intake, nutritional status, and health status are all evaluated in a rigorous and standardized manner. Since NHANES is widely used throughout the field to inform nutrition research, ASN has been a long-standing advocate for strengthening NHANES, and is pleased to see the recommendation echoed by the DGAC. For 2025, diet simulations helped to fill the gaps in subpopulation dietary intake that NHANES is unable to oversample for. More resources are needed to truly understand the dietary intake of various U.S. subpopulations.

ASN appreciates the other report recommendations that highlight several data and research gaps and the DGAC's efforts to highlight important areas where the research is absent or insufficient. ASN encourages the U.S. government agencies to translate key research areas where there is insufficient or limited evidence in the Scientific Report into funding priorities and encourages researchers to use them as a guide. ASN also urges the government to develop a new and comprehensive federal nutrition research agenda and to further improve government-wide nutrition collaboration and coordination to address these needs. Ongoing and future nutrition research is of utmost importance to the development of future DGAs.

ASN supports dietary guidance that helps consumers select nutrient-rich foods and beverages as part of a healthful diet and that leads to positive behavior changes. Currently, the dietary behaviors and intake of the American population do not align with evidence-based dietary guidance. Adherence to dietary guidance as measured by Healthy Eating Index scores shows little movement towards healthy dietary patterns over the years. The translation of the DGAs into actionable consumer messages and resources is crucial to help individuals, families, and communities achieve healthy dietary patterns. As such, ASN applauds the DGAC report suggestion that USDA and HHS focus on developing and encouraging evidence-based behavioral and implementation strategies, as well as clear and understandable health communication campaigns and messages to incentivize the adoption of the DGAs across all life stages to encourage optimal nutrition across the life span and health span. ASN also hopes the Departments will widely promote the report to its intended audiences of policymakers, nutrition educators and health care providers, as well as others. It is important to ensure the DGAs can be readily understood and adopted by most Americans, so they can successfully lead to improved public health outcomes.

ASN supports efforts by the government to effectively implement and evaluate the DGAs to enable all Americans to select healthy dietary patterns with affordable, nutrient-dense foods and beverages to reverse the prevalence of diet-related chronic diseases. This includes USDA's ongoing work to highlight and promote MyPlate as a way to make healthy eating choices within various cultures, preferences, budgets, and traditions. As the government calls on its many experts within USDA and HHS and from a range of disciplines to craft the DGAs, similarly, ASN encourages the government to form interdisciplinary partnerships to implement the DGA recommendations. A range of expertise, including nutrition, agriculture, communications, food science, culinary, dietetics, behavior, economic and public health professionals should be used to develop effective messaging to communicate the DGAs to Americans and to affect the many factors that influence dietary intake and other food-related behaviors. ASN suggests that HHS and USDA convene focus groups of potential DGA users from civil society organizations, businesses such as food retailers and restaurants, food and beverage manufacturers, and medical

and public health communities to provide insight into effective and scalable strategies for the implementation of recommendations found in the DGAs. Collaboration among many disciplines and stakeholders across different settings and sectors will be important to implement, monitor and evaluate the adoption of the DGAs by Americans. The ASN stands ready and welcomes opportunities to assist the government with the translation, implementation and evaluation of the 2025-2030 DGAs.

Thank you for the opportunity to provide comments. Please contact Sarah Ohlhorst, MS, RD, ASN Chief Science Policy Officer [240-428-3647; <mailto:sohlhorst@nutrition.org>], should you have any questions or if ASN may provide additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Courtney", with a long horizontal line extending to the right.

John E. Courtney, Ph.D.
Chief Executive Officer