I am Pepin Tuma, with the Academy of Nutrition and Dietetics, representing more than 107,000 registered dietitian nutritionists and other nutrition professionals.

There are two related themes we would like to underscore this afternoon:

1. The Scientific Report needs to provide clear, relevant dietary guidance appropriate for distinct subpopulations
2. It is critical to draft the Scientific Report while bearing in mind the immense, real impact of the work you are doing—specifically the fact that Guidelines will dictate vast amounts of food policy, nutrition education, and food consumption in the United States.

First, we applaud the shift to a life-stages approach as an important step in ensuring the Dietary Guidelines are both relevant and accurate. These Guidelines will be the first to include nutrition guidance tailored for infants and young children, and we hope they will provide relevant guidance for the elderly, the 133 million Americans with one or more chronic health conditions, and for individuals from various cultural backgrounds. As DGAC members stated yesterday, we must meet people where they are, recognizing the role that socioeconomic status, health, food insecurity, and life-stage plays in determining how to help Americans meet their diverse dietary needs.

Second, it is important to assess how the recommendations in your Scientific Report and the final Guidelines currently are and will be translated into practice. In the past two months, the GAO published a report looking at Nutrition Assistance Programs intended to meet the needs of older adults and USDA proposed yet another change to child nutrition program standards likely to limit access to an adequate amount and variety of fruits and vegetables (among other changes). Whether it is the Child and Adult Care
Food Program, congregate or home delivered meal programs, the National School Lunch Program, or the School Breakfast Program, the Dietary Guidelines form the basis for the underlying nutrition requirements. And it is appropriate—and indeed necessary—to ascertain whether these programs are successfully meeting the requirements. Many children consume two-thirds of their meals at school; are these meals ensuring children meet two-thirds of their dietary needs in a healthy way? Are they helping to establish healthy eating behaviors, or are we moving backwards?

The GAO report states that, “HHS plans to focus on older adults in a future update to the Guidelines but has not documented a plan for doing so.” It recommends that, “Documenting such a plan could help ensure guidelines better address the needs of the population.” We respectfully encourage the advisory committee to identify opportunities to address these issues now, enabling a more robust plan to be developed and solidified in advance of the 2025-2030 Guidelines.

Whether one is implementing government food and nutrition programs or just a single American trying to eat right, it can be challenging to meet recommended food and consumption patterns, but the solution is not to change the recommendations or throw up our hands and tacitly agree not to meet them. The Scientific Report can provide clarity, acting as a compass for the direction, development and implementation of the federal programs’ nutrition standards. When there are challenges identified in meeting food patterns, acknowledge them in advance and couple guidelines with known strategies to help facilitate behavior change (like nutrition education) that will help facilitate full adoption of DGAs in different food environments.