
Since 1980, the Dietary Guidelines for Americans (DGA) have provided evidence-based advice “to help all individuals and their families consume a healthy, nutritionally adequate diet.” Produced jointly by the U.S. Department of Agriculture (USDA) and the U.S. Department of Health and Human Services (HHS), this guidance forms the basis for federal nutrition policies and programs. Federal law requires a new DGA to be published every 5 years; the ninth and most recent edition is the Dietary Guidelines for Americans, 2020–2025 (2020–2025 DGA).

Given its reach, the DGA must meet the highest standards for scientific rigor and integrity. In 2017, the National Academies evaluated the process used to create the DGA in two reports that made recommendations for improvements. In 2021, Congress mandated that the National Academies convene a new committee to assess how well USDA and HHS implemented the seven recommendations contained in the second 2017 report. This report describes the committee’s findings and conclusions related to this assessment. Notably, this report does not evaluate the merits of the DGA 2020–2025 but evaluates the process by which they were created relative to the recommendations made in 2017.

THE COMMITTEE’S TASK
Congress asked the committee to determine how the process to develop the 2020–2025 DGA compared to seven recommendations identified in the 2017 report and how the timeline, cost, and/or integrity of the most recently issued guidelines would have been different if the 2017 recommendations were implemented fully. To accomplish its task, the committee assessed whether the recommendations were implemented and, if so, to what extent. The committee distinguished between those that were partially or
substantially implemented to indicate those that needed more or less additional work, respectively, to achieve full implementation.

Congress also asked the committee to determine whether the criteria used to include scientific studies in the evidence base to inform the 2020–2025 DGA ensured that the evidence base was current, rigorous, and generalizable. The committee concluded that the overall search strategy was well described and justified and was generally implemented as proposed in the 2017 National Academies report. The methodology for new systematic reviews was more carefully developed than the methodology for using existing systematic reviews. The absence of the recommended ongoing surveillance system for published research hampers the ability to determine the need for and type of updates that are required. Finally, the exclusion of prevention–intervention research and research from countries not classified with a high Human Development Index may reduce the generalizability of the outcomes of the systematic reviews to the U.S. population. More information about this task can be found in Evaluating the Process to Develop the Dietary Guidelines for Americans, 2020–2025: A Midcourse Report.

ASSessment of the implementation of the 2017 report’s recommendations

The first recommendation was to redesign the DGA process to prioritize topics to be reviewed in each DGA cycle, and redistribute the current functions of the Dietary Guidelines Advisory Committee (DGAC) to three separate groups: a Dietary Guidelines Planning and Continuity Group (DGPCG) to identify and prioritize topics for inclusion in each DGA and provide strategic planning support across DGA cycles; a set of Technical Expert Panels (TEPs) to consult on methodology for evaluating evidence; and a Dietary Guidelines Scientific Advisory Committee to evaluate evidence, draw conclusions, and make recommendations. This recommendation was not fully implemented by USDA and HHS. However, they implemented changes while developing the 2020–2025 DGA that partially met the intent of this recommendation. The committee was unable to determine how full implementation would have affected the 2020–2025 DGA. Given that USDA and HHS did not create a DGPCG during the 2020–2025 DGA cycle, the 2025–2030 DGA process has begun without the benefits of strategic planning and insights from external scientific experts.

The second recommendation was to provide the public with a clear explanation of when the DGA omits or accepts only parts of the DGAC Scientific Report. This recommendation was substantially implemented. The DGAC Scientific Report and DGA differed in only a few places, and those related to added sugars and alcohol were explained. Full implementation of this recommendation would have contributed to improved transparency and, thus, integrity of the DGA.

The third recommendation was to clearly separate the roles of the Nutrition Evidence Library (now Nutrition Evidence Systematic Reviews [NESR]) from those of the DGAC. The 2017 report recommended that NESR should plan and conduct systematic reviews with input from TEPs, while the DGAC or the proposed DGSAC should synthesize and interpret the results of systematic reviews to draw conclusions about the entire body of evidence. The report also recommended that the systematic reviews should be externally peer reviewed before they are made available for use by the DGAC or the DGSAC. This recommendation was partially implemented. Although the systematic reviews for the 2020–2025 DGA process were, for the first time, peer reviewed, this peer review was not conducted by experts external to the federal government. While the roles of both NESR and the DGAC were defined, there was still some sharing of tasks between them, which indicates that some elements of the recommendation were not implemented as envisioned.

The fourth recommendation was to ensure that NESR systematic reviews align with best practices by enabling ongoing training of NESR staff, engaging with and learning from nongovernmental groups on the forefront of systematic review methods, inviting external systematic review experts to evaluate NESR’s methods, and investing in technological infrastructure. This recommendation was substantially implemented.
NESR’s strong Continuous Quality Advancement led to significant refinements in the systematic review process, but other potential refinements were not addressed. To sustain the rigor, integrity, and trustworthiness of the DGA, this committee concludes it is critical for USDA and HHS to fully implement this recommendation.

The fifth recommendation was to enhance food pattern modeling “to better reflect the complex interactions involved, variability in intakes, and ranges of possible healthful diets.” This recommendation was partially implemented. Although some refinements to the food pattern modeling were made during the 2020–2025 DGA process, the analytic methods used did not change. This limits the capacity of the food patterns to reflect the heterogeneity of the population and variability of food patterns, with implications for the rigor of the DGA.

The sixth recommendation was to standardize the methods and criteria for establishing nutrients of concern. This recommendation was implemented through the development of a framework that standardized the terminology, thresholds, analytic methods, and interpretation related to nutrients of concern. USDA and HHS have not yet publicly documented their descriptive data analyses used across previous DGACs. The committee concluded that the few remaining gaps in the implementation of this recommendation are unlikely to have substantially affected the content or perceived rigor of the 2020–2025 DGA.

Finally, the seventh recommendation was to commission research and evaluate strategies to develop and implement systems approaches into the DGA, and to use the selected strategies to integrate systems mapping and modeling into the DGA process. This recommendation was not implemented. The use of systems approaches and methods could substantially improve the rigor, integrity, and thus trustworthiness of future editions of the DGA.

CONCLUSIONS
The committee concluded that additional non–federal expertise was not sought during the 2020–2025 DGA process. As a result, the objective of the 2017 National Academies committee to achieve a more deliberative process has not yet been achieved. Except for refinements made to the systematic review process and to standardizing the process for identifying nutrients of concern, the committee concluded that the proposed analytic and methodologic improvements to the DGA process had not yet been achieved. The DGA process still lacks an overall analytic framework.

Overall, the committee concluded that it is not yet possible to evaluate the full potential of the proposed redesign of the DGA process to support its continued improvement. An implication of these conclusions is that opportunities remain to improve the deliberative nature, transparency, rigor, and integrity of the DGA process and the ability of the DGA to address the needs of the diverse U.S. population.

THE COMMITTEE’S OVERALL PERSPECTIVE
The 2017 report was released after the process had begun to develop the 2020–2025 DGA, so it was not expected that all recommendations would be implemented during this cycle. To their credit, USDA and HHS made numerous changes in response to the recommendations and substantially implemented several of them. They also implemented alternatives that they considered to be better than certain recommendations and less difficult and costly to implement.

This evaluation revealed many successes, particularly related to transparency. Importantly, substantial opportunities for further improvements to the DGA process remain, especially relative to promoting diversity of experience and expertise, supporting a deliberative process, and adopting state–of–the–art processes and methods.

This report provides an assessment of the implementation of the 2017 recommendations in the spirit of making a strong process even better. Several of the issues identified by the 2017 committee still exist and will only become more challenging with each succeeding edition of the DGA. The committee acknowledges that implementing some of the recommendations is difficult.
and will require strategic planning by USDA and HHS as well as staff effort and funding but the committee regards such investments as crucial because the DGA are foundational for nutrition-related federal programs and the nation’s health.