

Myths vs. Facts: Correcting Misinformation about the Dietary Guidelines

Background

The <u>Dietary Guidelines for Americans</u> (DGA) provide science-based advice on what to eat and drink to meet nutrient needs, promote health, and reduce the risk of chronic disease.¹ The United States Department of Agriculture (USDA) and Health and Human Services (HHS) update the guidelines every five years, informed by recommendations from the Dietary Guidelines Advisory Committee (DGAC). **The DGA are currently being updated to be released by the end of 2025.**

The DGA inform all federal nutrition programs, meaning they impact at least one in four Americans through programs like: the National School Lunch Program and School Breakfast Program, the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), the Older Americans Act congregate and home-delivered meal programs, and nutrition education resources used by dietitians, physicians, teachers, and others.^a **Given the DGA's reach and impact, they are the most influential lever to shift food procurement and dietary patterns in the US.**

In recent months, there have been multiple threats to the scientific integrity and public health potential of the DGA, in part due to misinformation about the DGA's process and impacts. **The DGA process – currently designed to be apolitical, scientifically rigorous, and transparent – must not be compromised.** This resource is intended to correct the record on common myths about the DGA.

Myth: The DGA have contributed to unhealthy eating habits and the chronic disease epidemic in the US.

FACT: It is true that more than half of adults live with chronic disease in our country.^{iii,iv} However, the DGA is not to blame: most Americans don't follow the DGA. A 2024 systematic review found that eating a diet more aligned with the DGA, as measured by the Healthy Eating Index (HEI), was associated with lower mortality risk.^v However, the average American HEI score for ages two and older is 58 out of 100, indicating poor adherence.^{vi} Despite the broad reach of the DGA, more must be done to make it easier for individual Americans to follow its advice.

The DGA's role in school meals has also come under attack, but **school meals are a perfect example of the DGA actively** *improving* **nutritional outcomes.** The 2015 DGA recommended limiting added sugars to less than 10 percent of calories daily, yet the 2020 DGAC found that 70-80% of children still exceeded this limit.^{vii} As a result, USDA introduced specific added sugar limits for school meals, which will be fully implemented by 2027.^{viii} In short, school meals have too much sugar, but that is about to change for the better because of the DGA's research-based recommendations. Even before the new limits, research showed that school meals have the **highest nutritional quality** compared to other sources of food for children, thanks to improved alignment with the DGA.^{ix}

Myth: The DGA review process is not transparent or rigorous.

FACT: The DGAC's process includes multiple opportunities for public involvement:

- The scientific questions to be reviewed by each DGAC are informed by the previous DGAC report, topics of public health interest, and input from federal nutrition experts before being published for public comment and finalized.
- There is a public comment docket open for the entire duration of each DGAC's activity.
- Before the DGAC reviews the evidence, they develop written protocols, which establish criteria for the studies they will include and exclude in their analysis. They invite public comments on each draft protocol. These methods are publicly available and finalized before any data is analyzed, ensuring that the DGAC is not biased in its selection of studies and that its recommendations are based on well-designed studies.
- As they review the evidence, the DGAC presents and deliberates preliminary conclusions at public meetings. In the 2025 process, 7 public meetings were held.
- The DGAC's Scientific Report is available for public comment before the final DGA is written.

As for scientific rigor, the DGAC takes more than two years, with assistance from the USDA's Nutrition Evidence Systematic Review (NESR) team, to conduct data analysis, food pattern modeling, and systematic reviews, using pre-established inclusion criteria and a risk of bias assessment to ensure the DGAC's conclusions are based on methodologically rigorous studies with low risk of bias. While isolated studies that contradict broader findings may receive public attention, the DGAC offers conclusions based on the preponderance of evidence. For example, a few poorly designed studies that fail to detect a link between high-sodium diets and high blood pressure need to be put into context among the many studies that do find a link.

Myth: The DGAC did not address ultra-processed foods (UPFs).

FACT: The DGAC did address UPFs: they reviewed the scientific question, "What is the relationship between consumption of dietary patterns with varying amounts of ultra-processed foods and growth, body composition, and risk of obesity?" For children, adolescents, and adults, the DGAC found "limited" evidence that dietary patterns with higher amounts of UPFs are associated with excess body weight. However, the evidence was not consistent enough to reach strong conclusions, so the DGAC determined it would be premature to recommend categorically limiting UPFs. This is due to inconsistency in the methods and UPF definition used in the existing literature, not a lack of rigor by the DGAC.[×] The DGAC did call for more research and recommended that UPFs be reconsidered in the next DGA cycle.^{×i} The DGAC's recommendations can only be as strong as the existing evidence: **if policymakers want strong recommendations on UPFs, then increased federal funding is needed for rigorous, standardized research**.

That said, the DGA already does promote minimally processed foods through its recommendations to limit saturated fat, added sugar, sodium, processed meat, and sugar-sweetened beverages; these recommendations were reinforced by the 2025 DGAC.^{xii}

Myth: The DGAC is heavily influenced by industry and other conflicts of interest.

FACT: DGAC members are identified via public and self-nomination, thoroughly vetted, and appointed by the USDA and HHS; furthermore, their conclusion statements are made as a collective (and discussed in public meetings), so no individual member can determine the final recommendations in their report. Nominees in the last two cycles (2020 and 2025) were required to submit Confidential Financial Disclosure Reports prior to appointment, and 2025 DGAC members voluntarily released an aggregated list of disclosures.^{xiii} CSPI, among other public health groups, has called for public disclosure of individual conflicts to foster public trust in the process and further

incentivize the agencies to appoint nominees with minimal conflicts.^{xiv} However, the DGA development process has historically been most vulnerable to special interests *after* the DGAC finishes their work.

For example, the limit on added sugar was the subject of opposition from industry (like the International Dairy Foods Association) and other stakeholders during the 2020 update cycle. During their review, the 2020 DGAC found that most people could not accommodate up to 10 percent of calories from added sugars in a healthy diet, stating that "…less than 6 percent of energy from added sugars is more consistent with a dietary pattern that is nutritionally adequate."^{xv} In what appeared to be a concession to industry lobbying against the DGAC's science-based recommendations, USDA and HHS declined to reduce the limit on added sugars.

Myth: The DGA has been influenced by "leftist ideology" and has veered off-mission.

FACT: The DGA is subject to political influence given that its ultimate decisionmakers (the Secretaries of Agriculture and Health and Human Services) are political appointees. However, the independence of the DGAC helps ensure that science is paramount in the DGA development process. While nutrition science has evolved since the first DGA was released in 1980, **much of the DGA's core advice has remained consistent over the last 40 years (through both Democratic and Republican administrations)**. It typically calls on Americans to consume **more fruit, vegetables, and whole grains, and less refined grains, added sugars, sodium, and saturated fat**. This is because the development of the guidelines itself is a scientific process: recommendations, such as reducing sugar consumption or increasing plant-based foods, are based on evidence showing they contribute to better health outcomes.

If anything, some lawmakers are attempting to restrict the DGA based on political ideology. The House Farm, Food and National Security Act of 2024 (H.R.8467) proposed multiple provisions that would harm the scientific independence and integrity of the DGA process, like installing an "Independent Advisory Board" — appointed partially by USDA and HHS and partially by members of Congress — that would determine the scientific topics reviewed by the DGAC, explicitly introducing politics into a currently nonpartisan process.^{xvi} The bill also aims to limit the questions reviewed by the DGAC, prohibiting topics known to influence dietary behaviors and outcomes: social welfare policies, agricultural production practices, food labeling, and socioeconomic status, race, ethnicity, and culture. By banning consideration of evidence that is deeply intertwined with dietary patterns and health outcomes, these exclusions could prevent the DGA from serving all Americans. In March 2025, companion bills S.1129 and H.R.2326 mirrored this problematic language in their proposal "to amend the National Nutrition Monitoring and Related Research Act of 1990 to improve the dietary guidelines."

The DGA "provides advice on what to eat and drink to meet nutrient needs, promote health, and prevent disease. It is developed and written for a professional audience, including policymakers, healthcare providers, nutrition educators, and Federal nutrition program operators."^{xvii} Therefore, **anything that affects the nutrition access, health outcomes, and diet-related disease prevalence in the United States is within the scope of the DGA**.

For more information, please contact the Center for Science in the Public Interest at policy@cspinet.org.

xiii 2025 Dietary Guidelines Advisory Committee. *Disclosures*. March 13, 2023.

x^{iv} Center for Science in the Public Interest. Groups urge disclosure of potential financial conflicts among members of the dietary guidelines advisory committee. January 30, 2023. <u>https://www.cspinet.org/press-release/groups-urge-disclosure-potential-financial-conflicts-among-members-dietary-guidelines</u>

^{xv} Dietary Guidelines Advisory Committee. *Scientific Report of the 2020 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Health and Human Services and the Secretary of Agriculture*. 2020. Washington, DC: US Department of Agriculture. Pg. 11. <u>https://www.dietaryguidelines.gov/sites/default/files/2020-</u>

07/ScientificReport of the 2020DietaryGuidelinesAdvisoryCommittee first-print.pdf

^{xvi} Farm, Food, and National Security Act of 2024, H.R. 8467, 118th Congress. <u>https://www.congress.gov/bill/118th-congress/house-bill/8467</u>

^{xvii} Dietary Guidelines for Americans. *Purpose of the Dietary Guidelines.* USDA. <u>https://www.dietaryguidelines.gov/about-dietary-guidelines/purpose-dietary-guidelines.</u> Accessed March 24, 2025.

¹ US Department of Agriculture and US Department of Health and Human Services. *Dietary Guidelines for Americans, 2020-2025.* 9th Edition. December 2020. Available at DietaryGuidelines.gov

[&]quot; US Department of Agriculture Food and Nutrition Service. *About FNS.* December 20, 2024.

https://www.fns.usda.gov/about-fns

ⁱⁱⁱ Buttorff C, Ruder T, Bauman M. *Multiple chronic conditions in the United States.* RAND Corporation. 2017. https://www.rand.org/pubs/tools/TL221.html

^{iv} Boersma P, Black LI, Ward BW. Prevalence of Multiple Chronic Conditions Among US Adults, *Prev Chronic Dis.* 2020;17:200130.

^v Hao X, Li D. The Healthy Eating Index-2015 and All-Cause/Cause-Specific Mortality: A Systematic Review and Dose– Response Meta-Analysis. *Adv Nutr.* 2024;15(3):1-16.

^{vi} US Department of Agriculture, Food and Nutrition Service, Center for Nutrition Policy and Promotion. *Average Healthy Eating Index-2020 Scores for the US Population - Total Ages 2 and Older and by Age Groups,* WWEIA, NHANES 2017-2018. 2023.

^{vii} Food and Nutrition Service. *Added Sugars.* USDA. May 28, 2024. <u>https://www.fns.usda.gov/cn/school-nutrition-standards-updates/added-sugars</u>. Accessed March 20, 2025.

^{viii} 89 Fed Reg. 31962. Child Nutrition Programs: Meal Patterns Consistent With the 2020–2025 Dietary Guidelines for Americans. https://www.govinfo.gov/content/pkg/FR-2024-04-25/pdf/2024-08098.pdf

^{ix} Liu J, Micha R, Li Y, Mozaffarian D. Trends in Food Sources and Diet Quality Among US Children and Adults, 2003-2018. *JAMA Netw Open*. 2021;4(4):e215262.

^{*} US Department of Agriculture. Nutrition Evidence Systematic Review. *Systematic Review Question: What is the relationship between consumption of dietary patterns with varying amounts of ultra-processed foods and growth, body composition, and risk of obesity?* 2024. https://nesr.usda.gov/2025-dietary-guidelines-advisory-committee-systematic-reviews/dietary-patterns-ultraprocessed_growth-obesity

^{xi} 2025 Dietary Guidelines Advisory Committee. 2024. *Scientific Report of the 2025 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Health and Human Services and Secretary of Agriculture;* Part D. Chapter 2, pp. 18-19. US Department of Health and Human Services. https://doi.org/10.52570/DGAC2025

xⁱⁱ 2025 Dietary Guidelines Advisory Committee. 2024. *Scientific Report of the 2025 Dietary Guidelines Advisory Committee:* Advisory Report to the Secretary of Health and Human Services and Secretary of Agriculture. U.S. Department of Health and Human Services. Part D, Ch. 2, p. 26. <u>https://doi.org/10.52570/DGAC2025</u>

https://www.dietaryguidelines.gov/sites/default/files/2023-04/2025_DGAC_Disclosures.pdf