

Scientific Review by the 2020 Dietary Guidelines Advisory Committee

Managing Potential Conflict of Interest, Minimizing Bias

Maintaining scientific integrity throughout the process of developing the Dietary Guidelines for Americans is of utmost importance to USDA and HHS. One critical phase of the process is the independent, external evidence review by the 2020 Dietary Guidelines Advisory Committee, which is examining scientific evidence on topics and supporting questions identified by the Departments with public input. The Committee's scientific report will help inform USDA and HHS as the Departments write the 2020-2025 Dietary Guidelines for Americans.

Managing potential conflicts of interest (COI) and minimizing bias during this important scientific review phase is essential. To that end and to address recommendations by the National Academies of Sciences, Engineering and Medicine's [study](#) of the Dietary Guidelines process, USDA and HHS assess and manage potential conflicts of interest and work to minimize bias using several process steps, including those outlined below.

During Committee Selection

- Members appointed to the Dietary Guidelines Advisory Committee are required to submit a Confidential Financial Disclosure Report ([OGE Form 450](#)) upon appointment.
 - For the first time, the COI review was completed prior to appointing the 2020 Advisory Committee members as part of the selection process. Historically, this review was completed *after* the Committee was appointed.
 - In preparation for selecting the 2020 Advisory Committee, all individuals under final consideration for appointment were required to submit a Confidential Financial Disclosure Report *prior to* being appointed. The completed report was reviewed by USDA ethics officials with extensive expertise in this area, as USDA is the administrative lead for the 2020 Advisory Committee.
- For the first time, USDA and HHS requested specific information in nomination packages, including education, employment, peer-reviewed publications, presentations, blogs, funding sources, and other affiliations. These elements were reviewed for awareness and to support establishing a committee with broad representation and balance across many considerations, including topic areas, points of view, education, and expertise. There is a mix of practitioners, epidemiologists, clinical scientists and trialists, and others from every region of the United States to ensure the Committee is made up of a broad range of experience, expertise, and knowledge, and reflects diverse backgrounds.

During Committee Service

- As with previous Dietary Guidelines Advisory Committees, members of the 2020 Advisory Committee are appointed as “special government employees” (SGEs), selected based on recognized expertise or expert knowledge relevant to the Committee.
 - SGEs are subject to Federal employee ethics laws and regulations while serving in this role.
 - In contrast, none of the members are appointed as “representative members.” who are individuals appointed for the purpose of presenting the points of view of outside interest groups or stakeholders.
- USDA ethics officials will conduct an annual review of each Advisory Committee member’s OGE Form 450 to manage potential COI throughout the proceedings.
- Ethics training was provided to members of the 2020 Advisory Committee by USDA ethics officials prior to the first public meeting. The training materials and slides will be available at DietaryGuidelines.gov for reference at any time throughout the development of the *Dietary Guidelines*. All members are also required to receive annual ethics training.
- The approaches the Advisory Committee will use to examine the evidence – systematic reviews (original and existing), data analyses, and food pattern modeling – are rigorous, objective and protocol-driven, and are designed to minimize bias. Information about each approach’s methodology, along with the protocols for each question being addressed, will be posted to DietaryGuidelines.gov, providing transparency to the public throughout the Committee’s deliberations.
- The Committee’s review of the evidence is completed in a collaborative manner. Its work is not based on any one member’s expertise, nor will the final decisions for its scientific evaluation be reached on an individual-by-individual basis. The Committee will come to its conclusions together.
- The Advisory Committee will provide a summary of how it worked to manage potential conflicts of interest and minimize bias in its scientific report.

The Dietary Guidelines for Americans serves as the cornerstone of federal nutrition programs and policies, providing food-based recommendations to help prevent diet-related chronic diseases and promote overall health. According to the National Nutrition Monitoring and Related Research Act of 1990, the Dietary Guidelines is mandated to reflect the preponderance of scientific evidence, and is published jointly by USDA and HHS every five years.