

May 15, 2022

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Office of the Assistant Secretary for Health (OASH)  
Department of Health and Human Services  
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Comments on Scientific Questions To Be Examined To Support the Development of the *Dietary Guidelines for Americans, 2025–2030* (87 FR 22540)

Dear Ms. de Jesus:

Thank you for the opportunity to provide input on the scientific questions to be examined to support the development of the next *Dietary Guidelines for Americans*. We appreciate the opportunity to have early input into the process and the commitment to developing the strongest and most relevant scientific questions for consideration.

1,000 Days works every day to create a healthier and more equitable future for all pregnant, birthing, postpartum, and parenting people and their children. We lead the fight to build a strong foundation for mothers, children, and families to thrive. The first 1,000 days from pregnancy to age 2 offer a window of opportunity to create a healthier and more equitable future for all.

Good nutrition is critical during the first 1,000 days. Good nutrition during pregnancy and the first years of a child's life provides the essential building blocks for brain development, healthy growth and a strong immune system. In addition, a growing body of scientific research indicates that the foundations for lifelong health—including predispositions to obesity and certain chronic diseases—are largely set during this 1,000-day period.

There are three crucial stages in the first 1,000 days: pregnancy, infancy and toddlerhood. At each stage during the 1,000-day window, the developing brain is vulnerable to poor nutrition—either through the absence of key nutrients required for proper cognitive functioning and neural connections and/or through the “toxic stress” experienced by a young child whose family has experienced prolonged or acute adversity caused by food insecurity. Additionally, children should eat a diverse diet of nutrient-rich foods to help fuel their growth and development and shape their taste preferences for healthy foods.

We were pleased to see the emphasis on looking at evidence across the lifespan as part of the scientific questions. It is critical to include infants, toddlers, and individuals who are pregnant or lactating to build on the work of the *Dietary Guidelines for Americans, 2020-2025*. We also support the prioritization of health equity. Not only should the *Dietary Guidelines* be relevant to people with diverse racial, ethnic, socioeconomic, and cultural backgrounds but also to the federal nutrition programs that serve those people. The Dietary Guidelines serve an essential role in elevating the prioritization of nutrition in early childcare, early education and other school settings and also providing the scientific basis to provide needed updates to nutrition standards for the federal nutrition programs.

To further strengthen the proposed scientific questions, we recommend the following:

### **Expand the Outcomes in the Lifespan Questions to include Developmental Milestones for Infants and Toddlers**

We believe it is critical to broaden the focus on outcomes. Currently, the emphasis of the life stages scientific questions is about lifespan for infants and toddlers and focused on growth and risk of overweight / obesity. However, measurement of outcomes, particularly in the 1,000-day window, must include child development more broadly and cognitive development at a minimum. There is one proposed question that includes developmental milestones, “What is the relationship between dietary patterns consumed before and during pregnancy and lactation and developmental milestones, including neurocognitive development, in the child?” and this approach should be applied to all questions that include infants and toddlers.

### **Include Questions from the 2020 Dietary Guidelines Advisory Committee Report**

While we realize there are too many proposed questions in the *Scientific Report of the 2020 Dietary Guidelines Advisory Committee* to be covered in this review process, proposed research questions related in maternal, infant and toddler health should be prioritized due to their recent inclusion in the *Dietary Guidelines*. Some questions from the 2020 DGAC Report<sup>i</sup> we identified as priorities for inclusion are:

- The dietary determinants of maternal iodine status (in both pregnancy and lactation) and the relationship between maternal iodine intake and maternal and child outcomes, including child development.
- The relationship between maternal dietary supplement and/or fortified food intake of vitamins B12, vitamin D, iron, and choline and maternal and child outcomes.
- Evidence about human milk feeding and maternal health outcomes (e.g., postpartum weight loss, diabetes) to complement reviews about human milk feeding and offspring health outcomes.
- Relationships between infant milk-feeding practices and infant mortality, infectious diseases, and child development
- Evidence about how to feed infants and toddlers to complement reviews about what to feed infants and toddlers. Important topics may include feeding human milk at the breast compared to by bottle, repeated exposure to foods, and care provider feeding practices, such as responsive feeding.

### **Updates of Breastmilk Composition and Consumption**

Inclusion of ages 0 to 2 years in the 2020-2025 *Dietary Guidelines* was a tremendous advancement in federal dietary guidelines. To continue to build upon the dietary guidance for these age groups and fully realize opportunities to improve maternal and infant health, additional investment is needed in assessing the nutrient composition for breastmilk in food consumption databases and improving estimates of breastmilk consumed by infants.<sup>ii</sup>

Thank you for the opportunity to provide input at this early stage in the process for the next *Dietary Guidelines for Americans*. The 2020-2025 edition of the *Dietary Guidelines* was groundbreaking for providing nutrition recommendations for the 1,000-day window. We look forward to the next edition of the *Dietary Guidelines* strengthening and building on that initial work.

Sincerely,

Blythe Thomas

Initiative Director  
1,000 Days, an Initiative of FHI Solutions

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<sup>i</sup> Dietary Guidelines Advisory Committee. 2020. Scientific Report of the 2020 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Agriculture and the Secretary of Health and Human Services. U.S. Department of Agriculture, Agricultural Research Service, Washington, DC. Available at: <https://doi.org/10.52570/DGAC2020>

<sup>ii</sup> Kellie O Casavale, Jaspreet K C Ahuja, Xianli Wu, Ying Li, Julia Quam, Richard Olson, Pamela Pehrsson, Lindsay Allen, Douglas Balentine, Manjit Hanspal, Deborah Hayward, Erin Pias Hines, James P McClung, Cria G Perrine, Mandy Brown Belfort, David Dallas, Bruce German, Jae Kim, Mark McGuire, Michelle McGuire, Ardythe L Morrow, Margaret Neville, Laurie Nommsen-Rivers, Kathleen M Rasmussen, Janos Zemleni, Christopher J Lynch, NIH workshop on human milk composition: summary and visions, *The American Journal of Clinical Nutrition*, Volume 110, Issue 3, September 2019, Pages 769–779, <https://doi.org/10.1093/ajcn/nqz123>