

defeat **malnutrition** today

February 4, 2020

2020 Dietary Guidelines Advisory Committee

Docket FNS-2019-0001

Electronically via regulations.gov

Members of the Committee:

As policy director of the Defeat Malnutrition Today coalition, I presented before the Committee on July 11, 2019 and submitted written comments on July 23, 2019. This comment is a follow-up to my previous comments and focuses on a new report released by the Government Accountability Office (GAO) in late December 2019 which discusses the Dietary Guidelines as they relate to older adults.

Defeat Malnutrition Today is a diverse coalition of over 100 national, state, and local organizations, including groups such as the Academy of Nutrition and Dietetics, the American Society of Nutrition, and the American Society for Parenteral and Enteral Nutrition, who are committed to defeating older adult malnutrition across the continuum of care. We are focused on advancing this fight through federal and state policy and advocacy.

Older adult malnutrition is a growing crisis in America today—one in two older adults face the threat of malnourishment. Malnutrition is pervasive, costly, and contributes to disability and slower recovery; however, it has not yet been addressed by a systematic, consistent approach throughout the continuum of care, including in our communities.

As I previously noted, the framework and approach outlined for the 2020-2025 Dietary Guidelines highlight the importance of guidelines to improve the nutritional intake of Americans across the lifespan. However, this approach is not closely considering the needs of older adults, particularly those with chronic conditions that can be addressed through proper nutrition.

In a report entitled "[Nutrition Assistance Programs: Agencies Could Do More to Help Address the Nutritional Needs of Older Adults](#)," the GAO found that "the majority of older adults in the U.S. have chronic conditions, and evidence shows that nutrition is associated with the development of such conditions."

Nevertheless, the GAO found that "the [current dietary] guidelines focus on the foods and nutrients healthy individuals need to maintain health and prevent nutrition-related chronic conditions, which limit their applicability to older adults who already have chronic conditions."

Further, the GAO also found through its research that "older adults' nutritional needs can vary with age and many face certain challenges that additional nutrition guidance could help address, such as the management of chronic conditions or age-related changes, yet guidance

currently falls short in part because of limited research evaluating older adults' nutritional needs.”

HHS officials said to the GAO in response to the GAO findings that “when they lead the 2025-2030 Dietary Guidelines update, they intend to include a focus on nutritional guidance for older adults. However, HHS has not yet documented this intention, such as through a formal plan.”

What does this mean for the current Dietary Guidelines Advisory Committee?

First and foremost, the current Committee should take a closer look at any current guidelines updates that might impact older adults, such as the sarcopenia-related questions, and make sure that they cover the gamut of older adults, including the oldest old and those with chronic conditions.

Further, the current Committee should encourage research into older adults' nutritional needs now so that the results can inform the 2025-2030 update, and the current Committee should encourage HHS to plan for the next round of updates now so that work can begin as soon as possible on meeting these goals.

Thank you for considering these comments. If you would like further information, please reach out to me at mponder@matzblancato.com.

Sincerely,

A handwritten signature in black ink that reads "Meredith Whitmire". The signature is written in a cursive, flowing style.

Meredith Whitmire
Policy Director
Defeat Malnutrition Today