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Director, Nutrition Guidance and Analysis Division  
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U.S. Department of Agriculture  
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Alexandria, VA 22302

Dear Dr. Olson and Ms. Rihane,

The North American Branch of the International Life Sciences Institute (ILSI North America) welcomes this opportunity to provide comments to the 2015 Dietary Guidelines Advisory Committee (DGAC).

ILSI North America is a public, non-profit organization that actively collaborates with government and academia to identify and resolve scientific issues important to the health of the public. The organization carries out its mission by sponsoring relevant research programs, professional education programs and workshops, seminars and publications, as well as providing a neutral forum for government, academic, and industry scientists to discuss and resolve scientific issues of common concern for the well-being of the general public. ILSI North America's programs are supported primarily by its industry membership.

During the fourth meeting of the DGAC, held 17-18 July 2014, the committee expressed the need for data to help clarify the differences between home-prepared foods and foods with a higher degree of processing. In response, ILSI North America would like to draw the committee's attention to two recent publications on work from the ILSI North America Committee on Food Value Decisions which was done in collaboration with RTI International and North Carolina State University. This work allows for the direct comparison between home-prepared foods and foods of varying degrees of processing (i.e.: frozen, canned, ready-to-eat, etc.)

In these publications, a new, web-based application for nutrition educators is presented. This web-based application, Food Value Analysis, can be found at [www.foodvalueanalysis.org](http://www.foodvalueanalysis.org). The Food Value Analysis application allows nutrition educators to compare home-prepared recipe versions of a food to various other forms of the same food. This comparison takes into account not only nutrition quality, but monetary cost, preparation time, food safety considerations, and shelf life, which allows nutrition educators to help consumers meet dietary recommendations with varying forms of foods while also taking other factors into consideration such as time availability and cooking skills which are often overlooked when developing dietary guidelines. The first publication, "A web-based food value analysis application to compare foods at different levels of preparation and processing"[1], describes the methodology used in the development of the application while the second publication, "Utility of a New Food Value Analysis Application to Evaluate Trade-Offs When Making Food Selections"[2], presents the application of the tool. The manuscript analyzes



one day diet menus taken from USDA FNS and Thrifty Food Plan sample menus substituting different forms of foods using the Healthy Eating Index (HEI) to compare diet quality.

This work provides the following conclusions:

- Foods of varying levels of processing can be used to reach dietary recommendations.
- There is more than one path to adherence to dietary recommendations (including fresh through ready-to-eat versions of foods).
- HEI scores do not vary appreciably from home-prepared to processed menu items.
- It is foods chosen, rather than the spectrum of processing that most affects diet quality.
- The “true cost” of a food for consumers goes beyond price and nutrition, with preparation time being a significant factor.
- Menus containing processed food items routinely had higher amounts of sodium compared to home-prepared foods. Although sodium is a component of HEI scores, the differences in HEI scores varied little, whether fresh or processed items were included.

ILSI North America would like to thank the DGAC for their consideration and appreciates the opportunity to provide the most recent and relevant data pertaining to your request of providing appropriate dietary recommendations to the public.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Hentges".

Eric Hentges, Ph.D.  
Executive Director  
ILSI North America



### **References (attached)**

1. Muth MK, Karns SA, Zmuda M, Coglaiti MC, Koynanagi M, Duffey K, Dunn C, Jensen HH, Gregory C. (2014). "Price, Nutrition, Time, and Other Trade-Offs: A Web-Based Food Value Analysis Application to Compare Foods at Different Levels of Preparation and Processing." *Nutrition Today* 49(4): 176-184.
2. Kretser A, Dunn C, DeVirgiliis R, Levine K. (2014). "Utility of a New Food Value Analysis Application to Evaluate Trade-offs When Making Food Selections." *Nutrition Today* 49(4): 185-195.