

REVIEW OF NIH NUTRITION EDUCATION MATERIALS

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Why do NIH nutrition education materials need to be reviewed?

Since 1990, there has been a Congressional mandate for joint DHHS/USDA review of nutrition education materials to be sure that these materials are consistent with the *Dietary Guidelines for Americans* (DGAs) and to be sure that agencies within DHHS and USDA speak with one voice with regard to nutrition information and advice. The Congressional mandate for the review process is from Title III of the National Nutrition Monitoring and Related Research Act of 1990 (PL 101-445). There is also a 1994 MOU between USDA and DHHS entitled “General Procedures for Review of Dietary Guidance for the General Population or Identified Population Subgroups,” which details the review process and explains how the two Departments will work together to carry out the reviews.

What materials should be reviewed?

The Congressional mandate for the review states that materials containing “dietary guidance for the general population or identified population subgroups” need to go through the review process, and the materials to be reviewed include “nutrition education materials (documents, brochures, fact sheets, web pages, videos, audios) intended for the general public.”

What materials are exempt from review?

Materials that do not require review include reports or papers intended for nutrition or medical professionals, materials that are intended specifically as patient treatment (i.e., materials that might be given to a patient from a physician or a dietitian), or materials that are regulatory in nature (e.g., FDA regulations).

How do I determine if a review is needed?

The following flow diagram may be used to identify the materials that require review and to help expedite some reviews:

QUESTION 1. Do the materials (print, electronic, audio, video) contain
(1) dietary guidance (i.e., information about types of foods, food groups,

and/or nutrients that should be consumed per meal or on a daily or weekly basis and/or information about the amount of foods or food groups to be consumed per meal or daily or weekly); and/or (2) information about topics covered in the DGAs such as obesity, weight management, diet-related chronic diseases, or alcohol consumption?

- A) If the answer to QUESTION 1 is NO, the materials do not require review.
- B) If the answer is YES, proceed to QUESTION 2.

QUESTION 2. Can the materials be classified as papers or reports for nutrition or medical professionals, materials intended specifically for patients, or regulatory materials?

- A) If the answer to QUESTION 2 is YES, the materials do not require review.
- B) If the answer is NO, proceed to QUESTION 3.

QUESTION 3. Have the information and messages in the materials been previously cleared by the NIH Nutrition Education Subcommittee (NES) and joint DHHS/USDA review groups?

- A) If the answer is YES, you may request an expedited review through the NES Chair, who will then request an expedited DHHS/USDA review. (These reviews will involve only the NES Chair and the DHHS/USDA review group Chairs.) You should provide the name of the previous materials, dates of NES and joint DHHS/USDA reviews, a copy of the new materials, and a copy of the previous materials or the website link where they may be found. If the request for an expedited review is denied, the materials must go through the regular review process.
- B) If the answer is NO, you should request a regular review through the NES. After incorporation of the NES comments, you should resubmit the materials to the NES Chair and they will be forwarded for joint DHHS/USDA review.

If you are still unclear about the need for NES and joint DHHS/USDA reviews, contact the NES Chair (jp157d@nih.gov) and discuss the content and need for review. Early-stage materials may be submitted to the NES Chair with a request for a decision about the need for review. The NES Chair may consult with the DNRC Director and the joint DHHS/USDA review Chairs about the need for review. Press releases, media spots, and marketing materials may require review if they contain dietary guidance information.

What is the NIH Nutrition Education Subcommittee (NES)?

The NIH Nutrition Education Subcommittee (NES) is a subcommittee of the NIH Nutrition Coordinating Committee (NCC). The NCC, which is chaired by Dr. Van Hubbard, Director of the Division of Nutrition Research Coordination (DNRC), has members and alternates from each ICU as well as liaisons from other Government agencies.

The main function of the NES is to provide reviews for nutrition education materials (publications, websites, brochures, etc.) that are intended for the general population or population subgroups. The primary goals of the NES reviews are to ensure consistency with the (DGAs) and to ensure scientific and technical accuracy. NES reviewers also provide other comments regarding organization, clarity, readability, grammar, etc. for the authors' consideration.

Membership in the NES is open to NIH personnel who have expertise in nutrition; representation is sought from as many of the 22 ICUs as possible. The current NES membership includes 13 members from eight ICUs: Rosalind Breslow (NIAAA), Becky Costello (ODS), Darla Danford (NHLBI), Janet de Jesus (NHLBI), Barbara Gross (DNRC), Wendy Johnson-Taylor (DNRC), Maureen Leser (CC), Carolyn Miles (NIDDK), Linda Nebeling (NCI), Jean Pennington, Chair (DNRC), Karen Regan (DNRC), Susanne Strickland (NICHD), and Elaine Trujillo (NCI). Oversight for the NES reviews is provided by the DNRC Director and Deputy Director.

For some reviews, additional NIH expertise from NCC members is requested, e.g., NIA has been consulted about materials for aging populations, and NIAMS has been consulted about materials on osteoporosis.

What does the NES do?

The NES serves two main functions:

- 1) It provides initial reviews of NIH nutrition education materials for cross-agency input and facilitates the joint DHHS/USDA review of these materials, and
- 2) It serves as part of the DHHS/USDA joint review process by providing comments on nutrition education materials prepared by other DHHS agencies and by USDA agencies.

On average, the NES reviews about 35 documents per year. On request, the NES will do optional reviews for NIH materials that do not require review, e.g., patient materials. Such materials are not sent for joint DHHS/USDA review. The NES will also do quick overviews of materials to determine if NES and joint DHHS/USDA reviews are required.

The NES Chair posts links to NIH nutrition education materials on the DNRC website (<http://dnrc.nih.gov>) and asks NCC members to review these links yearly and to provide updates as necessary to be sure they are current. More information about the NES and joint DHHS/USDA review process is available in "Nutrition education materials from the National Institutes of Health: Development, review, and availability" by JAT Pennington and VS Hubbard. *J Nutr Ed* 34:53-58, 2002.

How are the reviews for NIH materials conducted?

- 1) After clearance through the initiating NIH ICU, the materials (or the nutrition components of the materials) are submitted to the NES Chair.
- 2) The materials are sent to the NES members with a request for comments/concerns regarding consistency with the (DGAs) and scientific/technical accuracy. The review time is usually two weeks.
- 3) The comments are compiled by the NES Chair and sent to the initiating ICU. Concerns about consistency with the DGAs and/or scientific/technical accuracy are identified, and other suggestions regarding style, grammar, appropriateness for target audience, etc. are offered.

- 4) The initiating ICU considers the NES comments, revises the materials, and resubmits the materials to the NES Chair, who then forwards them to the Chair of the DHHS Nutrition Policy Board (NPB) Committee on Dietary Guidance (CDG) for joint DHHS/USDA review. (The USDA review group is called the Dietary Guidance Working Group (DGWG).) The joint review takes about three to four weeks, and the Chair of the DHHS NPBCDG forwards the joint DHHS/USDA comments to the NES Chair and to the initiating ICU author.
- 5) The initiating ICU then makes the requested changes and publishes the materials.

The NES review of NIH materials is needed before the joint DHHS/USDA review to be sure that NIH speaks with one voice with regard to nutrition education and also to allow NIH experts in various topic areas (e.g., heart disease, obesity, the aged, children, diabetes, cancer, osteoporosis) to have the opportunity to provide comments.

How are reviews for non-NIH materials conducted?

- 1) Materials developed by other DHHS agencies and by USDA agencies are submitted to the NES Chair from the Chair of the DHHS NPBCDG. (The NES serves as a member of the NPBCDG along with representatives from other DHHS agencies.)
- 2) The NES Chair distributes the materials to the NES members and requests comments within two weeks.
- 3) The NES Chair compiles the comments and sends them to the Chair of the DHHS NPBCDG.
- 4) Comments from NES and other members of the DHHS NPBCDG are compiled and merged with comments from the USDA DGWG and sent to the initiating party.

How are NES members instructed to review materials?

The following instructions are provided to NES reviewers:

- 1) Provide comments in a separate file and not on the document.
- 2) Clearly identify the page, paragraph, and sentence or line numbers for the statement or words of concern. (It helps to repeat the sentence or words to clarify the location.)
- 3) Clearly indicate what the concern is and offer a correction such as a revision or deletion.
- 4) Identify inconsistencies with the DGAs with a double asterisk and scientific/technical inaccuracies with a single asterisk. These are items that must be corrected by the author before publication. Other comments will be assumed to be suggestions to the authors.
- 5) If the materials provide web links for additional information, you are not required to go into web links and review the materials found there. However, you may do so if you wish. We will forward your comments related to whether or not a link works and whether or not the information found at the link is accurate. If the links are non-government sites, the authors should indicate to the user that he/she is leaving a government website.

Checklist and instructions for submitting NIH materials to the NES

- 1) Have the materials been cleared by the initiating ICU?

- 2) Have the materials been reviewed by a nutritionist or dietitian within the ICU who is knowledgeable of the DGAs and understands their application to materials for the population and subpopulations?
- 3) Have the materials been proofread for scientific and technical accuracy; for grammar, spelling, etc.; and for application for the intended target audience?
- 4) Are the pages numbered?
- 5) If the materials are web-based, put them into a Word document and be sure pages are numbered.
- 6) If the materials cover information that is in the domain of another ICU, it is best to have someone in that ICU read through them to insure intra-agency agreement.
- 7) Send the materials electronically to the NES Chair (jp157d@nih.gov) with a cover page (email note) that includes the following:
 - Name of document/materials:
 - Originating unit (Institute, Center, Division, Office)
 - Contact person, email address, phone number
 - Date of submission
 - Intended audience (age, gender, ethnic group and reading level)
 - Means of dissemination
 - Background research/focus-group testing that supports the materials (provide reference or brief description)
 - Basis of expedited/concurrent review, if requested
 - Time Constraints (e.g., publication deadline to use available funds, Agency or Departmental release of materials at an upcoming conference)
 - Previously cleared information (provide the name of the previous materials, dates of NES and joint DHHS/USDA reviews, a copy of the new materials, and a copy of the previous materials or the website link where they may be found.)

How long will the reviews take?

The NES review takes two weeks; expedited reviews may be possible upon request. The joint DHHS/USDA reviews take approximately three to four weeks.

Are there any changes in the review process with the publication of the 2005 DGAs?

The NES and joint DHHS/USDA review processes should not hinder creativity in the development of nutrition messages for consumers. Because the 2005 DGAs contain two food guides (the DASH diet and the USDA food guide), there will likely be more flexibility in terms of the food-related messages that may be conveyed to the public. New consumer messages should be permitted (and not viewed as inconsistent with the DGAs) if they are consistent with the scientific principles of the DGAs. It would be helpful if they are also backed up with contextual focus group testing and applied research.