

**From:** Edward Archer [<mailto:archer.edwardc@gmail.com>]

**Sent:** Friday, February 24, 2017 2:47 PM

**To:** Rosinger, Asher Yoel (CDC/OPHSS/NCHS) <[yxm9@cdc.gov](mailto:yxm9@cdc.gov)>; Herrick, Kirsten (CDC/OPHSS/NCHS) <[goi7@cdc.gov](mailto:goi7@cdc.gov)>; Gahche, Jaime J. (CDC/OPHSS/NCHS) <[dvt4@cdc.gov](mailto:dvt4@cdc.gov)>; Park, Sohyun (CDC/ONDIEH/NCCDPPH) <[geo7@cdc.gov](mailto:geo7@cdc.gov)>; Frenk, Steven M. (CDC/OPHSS/NCHS) <[xar3@cdc.gov](mailto:xar3@cdc.gov)>

**Subject:** Request for retraction/correction: Misconduct and/or a failure to perform due diligence

Dear Drs. Rosinger et al.,

Your recent publication in MMWR (02/17/17; 66(6);181) was based on methods and data that my work has refuted empirically and theoretically. As such, it should be retracted or corrected to inform the public that the data you published are invalid and therefore meaningless. Conclusions drawn from invalid data harm the health of all Americans.

Stated simply, memory-based methods (M-BMs) such as FFQs and 24-h dietary recalls are pseudoscientific and produce data that are "physiologically implausible", "incompatible with survival" and "inadmissible." (Please see the attached papers with links below).

Importantly, most nutrition epidemiologists have agreed that the use of energy intake data from M-BMs is fatally flawed and should not be published as estimates of actual energy intake as you have done in your publications. For example:

Dhurandhar et al. 2014. "Energy balance measurement: when something is not better than nothing." *Int J Obes (Lond)* 39 (7):1109-1113;

and

Subar, A. F., L. S. Freedman, J. A. Tooze, S. I. Kirkpatrick, C. Boushey, M. L. Neuhouser, F. E. Thompson, N. Potischman, P. M. Guenther, V. Tarasuk, J. Reedy, and S. M. Krebs-Smith. 2015. "Addressing Current Criticism Regarding the Value of Self-Report Dietary Data." *J Nutr* 145 (12):2639-45.

<http://jn.nutrition.org/content/early/2015/10/13/jn.115.219634>

Given the extant research, M-BM-data should not be used in scientific research or published on the CDC's website. Your lack of familiarity with this body of work suggests a lack of due diligence or incompetence on the part of your research team. If you are familiar with my work, it would be indicative of willful research misconduct as well as intellectual dishonesty to fail to inform your readers that the data you analyzed were previously demonstrated to be invalid. It is also in violation of the "[HHS Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated to the Public.](#)"

Given that your 'publication' of invalid data seriously misled and therefore harmed the public, I ask that you please contact the CDC/ATSDR [Office of Science Quality](#) to inform them of my complaint and retract your publication. **They are CCed on this email.**

This email is a my formal request for retraction/correction of your publications using these data. In this email I have met all the listed criteria for a complaint against your publication at this web address:

[https://www.cdc.gov/mmwr/volumes/66/wr/mm6606a8.htm?s\\_cid=mm6606a8\\_e#suggestedcitation](https://www.cdc.gov/mmwr/volumes/66/wr/mm6606a8.htm?s_cid=mm6606a8_e#suggestedcitation)

If you read my work (attached with links below), you will realize the validity of my conclusions and hopefully you and your co-authors will not use these pseudo-scientific methods and invalid data in the future.

<http://www.ncbi.nlm.nih.gov/pmc/articles/PMC4527547/>

[http://www.mayoclinicproceedings.org/article/S0025-6196\(15\)00797-1/fulltext](http://www.mayoclinicproceedings.org/article/S0025-6196(15)00797-1/fulltext)

<http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0076632>

Sincerely,

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