

September 17, 2019

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RE: Comment Request WIC Nutrition Assessment and Tailoring Study (2019-1541)

Dear Ms. Paolicelli:

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit comments to the USDA in response to its request for feedback on the WIC Nutrition Assessment and Tailoring Study (2019-1541), originally published in the Federal Register on July 19, 2019 (84 FR 34849). Representing more than 107,000 registered dietitian nutritionists (RDNs),<sup>1</sup> nutrition and dietetic technicians, registered (NDTRs), and advanced-degree nutritionists, the Academy is the largest association of food and nutrition professionals in the United States. We are committed to accelerating improvements in the nation’s health and well-being through food and nutrition.

**The Academy supports efforts to collect information in order to make data-driven decisions about policies and programs. The Academy suggests that USDA consider ways to most efficiently gather the data needed to meet the intended purpose of the data collection objectives and that results be shared to elevate best practices without limiting local flexibility to deliver nutrition services.**

**A. Importance of studying nutrition assessment and tailoring data**

The Academy acknowledges and applauds the efforts and objectives of the study to improve program satisfaction, retention, and participant health and nutrition outcomes. The Academy suggests that data to achieve some of the outlined objectives may already exist in reports such as the management reviews where data on nutrition services is collected and evaluated. Academy members have also expressed concern about the intent of the study to provide guidance. Given the wide range in variation of WIC clinics and the population accessing these clinics, the Academy urges that the results of this study would not limit local flexibility in delivering the WIC nutrition services but rather be compiled as best practices in order to share among WIC administrators interested in improving targeted services.

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<sup>1</sup>The Academy approved the optional use of the credential “registered dietitian nutritionist (RDN)” by “registered dietitians (RDs)” to more accurately convey who they are and what they do as the nation’s food and nutrition experts. The RD and RDN credentials have identical meanings and legal trademark definitions.

## **B. Estimate of the burden of the proposed collection**

Academy members working in WIC clinics report that the proposed data collection could pose challenges on both the state and local level. The Academy suggests field testing data collection requests with a pilot group to ensure that data being requested can actually be compiled as needed to meet the proposed objectives.

## **C. Enhanced quality, utility and clarity of the information to be collected**

In order to collect quality data to improve program services, the Academy recommends capturing best practices as it pertains to screening and referral for high risk pregnancies. In order to best provide medical nutrition therapy for high risk pregnancies, the sharing of medical records and making referrals is critical. Given innovation around electronic medical records and technology assisted referrals, it would behoove the WIC community to have documentation of clinics with best practices and health outcomes. The Academy also urges USDA to consider the variation among clinics including geography, staffing budgets and transportation when deciding how to best share and use the information collected through this study.

## **D. Conclusion**

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit comments to the USDA in response to its request for feedback on the WIC Nutrition Assessment and Tailoring Study. We urge USDA to consider adjustments to the methodology to ensure that the most effective and efficient steps are being taken to answer the study objectives and disseminate results to support improvement of services. Please contact either Jeanne Blankenship at 312-899-1730 or [jblankenship@eatright.org](mailto:jblankenship@eatright.org), or Liz Campbell at 202-775-8277 ext. 6021 or [ecampbell@eatright.org](mailto:ecampbell@eatright.org) with any questions or requests for additional information.

Sincerely,



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