

April 26, 2021

CDC Desk Officer
Office of Management and Budget
725 17th Street NW
Washington, DC 20503

120 South Riverside Plaza
Suite 2000
Chicago, Illinois 60606-6995
800.877.1600

1120 Connecticut Avenue NW
Suite 460
Washington, D.C. 20036

Reference: Medical Monitoring Project

Dear Dr. Zirger:

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit these comments to the Centers for Disease Control and Prevention relative to its March 26, 2021 information request: *Medical Monitoring Project*. Representing more than 107,000 registered dietitian nutritionists (RDNs),¹ nutrition and dietetic technicians, registered, and advanced degree nutritionists, the Academy is the world’s largest association of food and nutrition professionals and is committed to a vision of a world where all people thrive through the transformative power of food and nutrition. Every day our members provide medical nutrition therapy for patients in clinical settings across the continuum of care, often via telehealth, with the flexibilities necessary due to the COVID-19 public health emergency.

The Academy supports this revision to the referenced information collection to facilitate understanding of health care access and food insecurity during the COVID-19 public health emergency. We offer the below suggestions to enhance the utility of the information collection and especially to improve awareness of the value of RDNs and medical nutrition therapy at all stages of the HIV treatment process.

Specific Suggestions for Survey Questions

A. On page 12, for question DG 2.0, the Academy suggests expanding the available answer options with additional inclusive responses, such as “non-binary,” or “other.” The current choices lack the necessary inclusivity for people to accurately identify themselves. For consistency, the same suggestions could also apply to subsequent survey questions with answer options following the same general approach, and we recognize the substantial change this represents.

B. On page 20, for question FS 1.0, the Academy suggests modifying the question to reflect “...were you ever hungry but didn't eat because there wasn't enough money for food, *or because you or another household member were physically unable to acquire and prepare your food?*”

¹ 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.

C. On page 24, for question JW 1.0, the Academy suggests modifying the question to reflect “How would you rate your health?” A respondent could perceive their health to be different than an objective assessment, such as that conducted by a qualified health care provider. This may also better match the content of other survey questions asking what the respondent believes or how confident they are.

D. For questions KE 1.0 and KL 1.0 on page 27, and questions KU 2.0 and KU 4.0 on page 29, the Academy suggests adding parenthetical examples of healthcare workers to reflect “...doctor, nurse, or other healthcare worker (*e.g.*, registered dietitian nutritionist, social worker) for HIV care.” Including “registered dietitian nutritionist” is recommended because medical nutrition therapy provided by an RDN is likely to improve patient outcomes.²

E. For each of sections ND 11 (addressing access to food assistance programs) starting on page 106, and ND 12 (addressing access to meal or food service programs) starting on page 107, the Academy suggests adding a question, “Were you not able to get this service for any of the following reasons: ... because you were unable to understand how or where to apply, you were unable to complete the necessary forms, or you were unable to physically visit the office of the program provider?”

The Academy appreciates your consideration of our comment for the information collection *Medical Monitoring Project*. Please contact either Jeanne Blankenship at 312-899-1730 or by email at jblankenship@eatright.org or Mark Rifkin at 202-775-8277 ext. 6011 or by email at mrifkin@eatright.org with any questions or requests for additional information.

Sincerely,



Jeanne Blankenship, MS, RDN
Vice President
Policy Initiatives and Advocacy
Academy of Nutrition and Dietetics



Mark E. Rifkin, MS, RDN
Manager
Consumer Protection and Regulation
Academy of Nutrition and Dietetics

² Academy of Nutrition and Dietetics. HIV/AIDS Nutrition Evidence Analysis Project. http://www.adaevidencelibrary.com/conclusion.cfm?conclusion_statement_id=250707. Accessed August 2, 2020.