

November 27, 2017

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Re: Information Collection: IHS Customer Service Satisfaction and Similar Surveys

Dear Ms. Bennett-Barnes,

The Academy of Nutrition and Dietetics (the "Academy") appreciates the opportunity to submit comments to the Indian Health Service (IHS) at the United States Department of Health and Human Services (HHS) related to its September 27, 2017 information collection, "IHS Customer Service Satisfaction and Similar Surveys." Representing more than 100,000 registered dietitian nutritionists (RDNs),¹ dietetic technicians, registered (DTRs), and advanced-degree nutritionists, the Academy is the largest association of food and nutrition professionals in the United States. The Academy is committed to supporting provision of culturally-relevant essential nutrition services, including community nutrition support, to people of all demographic groups, including Native Americans and Alaska Natives, and to expanding program access and utilization.

The Academy supports these surveys as vital to addressing the substantial health needs of Native Americans and Alaska Natives. This population's challenges with food insecurity and comorbid chronic conditions create an even more critical state of disease which limits prognosis, decreases quality of life and increases costs.² However, fully measuring this population's satisfaction with provided services should include efficient integration with existing surveys. We offer the following formative suggestions to improve survey quality and reinforce the necessity of nutrition in these communities.

The Academy supports IHS's continuing efforts to effectively and efficiently provide useful nutrition resources to Native Americans and Alaska Natives. Given the high prevalence of chronic diseases in these populations directly linked to poor nutrition and lifestyle,³ meaningful reductions in the rates of these chronic diseases cannot be achieved without meaningful provision of nutrition services. Satisfaction surveys are essential to measuring and defining program effectiveness, but the best programs and associated surveys will

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.

² Health, United States, 2015 - Individual Charts and Tables: Spreadsheet, PDF, and PowerPoint files. Centers for Disease Control and Prevention. <https://www.cdc.gov/nchs/hus/contents2015.htm#019>.

³ Hutchinson RN, Shin S. Systematic review of health disparities for cardiovascular diseases and associated factors among American Indian and Alaska Native populations. PLoS One. 2014 Jan 15;9(1):e80973.

maximize efficiencies and limit redundancies, which reduces customer confusion, enhances customer satisfaction, and may be more likely to support effective behavior change.

Specific to the nutrition surveys, the Indian Health Service may find it useful to partner with the United States Department of Agriculture's Food & Nutrition Service's SNAP-Ed program⁴ or National Institute of Food and Agriculture's Expanded Food and Nutrition Program program⁵ to utilize their evidence-based surveys to collect information. It appears that these programs utilize a wide-variety of nutrition based surveys that could be condensed into one format applicable for use by numerous programs. Thus, consistent and similar information collections could be applied more broadly, but also broken down by region and/or location if needed.

The Academy appreciates the opportunity to comment on the proposed information collection for the "IHS Customer Service Satisfaction and Similar Surveys " docket and we look forward to continuing to work with IHS to improve nutrition programs for Native Americans and Alaska Natives. 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,



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⁴ United States Department of Agriculture, SNAP-Education Program; Accessed on November 27, 2017 at <https://snaped.fns.usda.gov>.

⁵ United States Department of Agriculture, Expanded Food and Nutrition Education Program. Accessed on November 27, 2017 at <https://www2.ag.purdue.edu/programs/hhs/efnep/Pages/Resource-Evaluation-Adult.aspx>.