

October 15, 2020

Sheleen Dumas  
Department PRA Clearance Officer  
Office of the Chief Information Officer  
Department of Commerce  
1401 Constitution Ave. NW  
Washington, DC 20230

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

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

RE: Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; Household Pulse Survey

Dear Ms. Dumas:

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit comments to the Department of Commerce of the U.S. Census Bureau related to its proposed information collection, “Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; Household Pulse Survey (OMB No. 0607-1013)” published into the Federal Register originally on May 19, 2020. 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 the continuation of the data collection efforts to study the experience of American households during the COVID-19 pandemic and recommends that the study questions be updated to include household use of Pandemic Electronic Benefit Transfer (P-EBT) and The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). Under the Families First Coronavirus Response Act and the Coronavirus Aid, Relief, and Economic Security Act, these two programs, along with the Supplemental Nutrition Assistance Program, school meals, senior nutrition programs and commodity distribution programs were given special authority and funding to protect the food security of American households during the pandemic.**

### **Academy position on Food Insecurity**

The Academy is committed to improving the health of Americans by ensuring access to a nourishing, safe and affordable food supply. The dietetics practitioner and nutrition educators consider the health, safety and welfare of the public at all times. The Academy’s

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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.

guiding principle is our commitment to improving health for all, especially those most susceptible to food insecurity. It is the position of the Academy that systematic and sustained action is needed to achieve food and nutrition security in the United States. To achieve food security, effective interventions are needed, along with adequate funding for, and increased utilization of: food and nutrition assistance programs; inclusion of nutrition education in such programs; strategies to support individual and household economic stability; and research to measure impact on food insecurity- and health related outcomes.<sup>2</sup>

The Academy is particularly concerned about the disproportionate impact the COVID-19 pandemic has had on communities of color due partially to limited access to healthy food and proper health care. The Centers for Disease Control and Prevention have reported that people from racial and ethnic minority groups are being hospitalized and dying from COVID-19 at much higher rates than white people. These same communities already were far more likely to experience food insecurity.

### **Necessity of the Proposed Collection**

The Academy believes the information collected by the Household Pulse survey is helpful to assess the shorter-term impacts of the pandemic on food security and to understand at what point during the recovery stage food security improves. It can be a critical tool for federal, state and local governments to determine which policies were most effective. Specifically, having this data available at the county level allows for comparisons between geographic areas and jurisdictions that have enacted different COVID-19 response policies. This will allow us to investigate potential policy impacts more accurately on food security during the pandemic.

### **Practical Utility of Information Collection**

Under FFCRA and CARES Act, the U.S. Department of Agriculture was given authority to launch and provide flexibilities to federal nutrition programs to protect access to healthy food during the COVID-19 pandemic. These federally funded nutrition programs include WIC and P-EBT. However, the questions in this pulse survey only address access to SNAP and school meal programs. The Academy urges USDA to include questions that assess access to WIC and P-EBT as strategies to address food insecurity.

Specifically, the Academy suggests modifying or including the following questions:

- Q27a: Do you or does anyone in your household receive benefits from any of the following nutrition assistance programs? (Select all that apply)
- Q27b: Which months were benefits received? (Select all that apply)
- New: Has receiving nutrition assistance helped your household get the types of food you need? (Yes/No)

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<sup>2</sup> Holben, D. (2010). Position of the American Dietetic Association: Food Insecurity in the United States. *Journal of the American Dietetic Association*. 110(9), 1368-1377.

- New: Which program(s) has/have been the most helpful for your household to get the types of foods you need (Select all that apply)
- New: Why did the nutrition assistance program(s) not help your household get the types of foods you need (Select all that apply)

### Conclusion

The Academy appreciates the opportunity to submit comments to the Department of Commerce of the U.S. Census Bureau about the Household Pulse Survey. The Academy urges inclusion of additional federal nutrition programs in the food security section of the survey. Please contact either Jeanne Blankenship at 312-899-1730 or by email at [jblankenship@eatright.org](mailto:jblankenship@eatright.org) or Liz Campbell at 202-775-8277 ext. 6021 or by email at [ecampbell@eatright.org](mailto:ecampbell@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



Liz Campbell, MA, RDN  
Senior Director  
Legislative & Government Affairs  
Academy of Nutrition and Dietetics