

November 1, 2021

Dr. Christopher Lynch
Office of Nutrition Research
National Institutes of Health
Bethesda, Maryland 20892



Re: NOT-OD-21-183 Request for Information: Research Opportunities to End Hunger, Food and Nutrition Insecurity

Dear Dr. Lynch:

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit comments to the National Institutes of Health in response to its Request for Information “*Research Opportunities to End Hunger, Food and Nutrition Insecurity*”. Representing over 112,000 registered dietitian nutritionists (RDNs), 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 of Nutrition and Dietetics applauds the NIH’s efforts to examine approaches to address hunger, food insecurity and nutrition insecurity through innovative and multidisciplinary research.

A. Academy Research Priorities

Beginning in 2018, the Academy’s Council on Research updated the [Research Priorities](#) of the organization through an interactive process to assess emergent research needs and identify research priorities that, if addressed, would have the greatest impact on knowledge advancement and empowerment of nutrition and dietetics practitioners, students, interns and retired members. The priorities fall within four themes: 1) nutrition-related discovery 2) clinical nutrition research 3) implementation science and 4) public health. This RFI is well-aligned with the identified priority theme “public health” which specifically calls for research in the following areas:

- Assess the multi-directional relationship between food systems – including various food production, processing, and distribution practices – and nutrition and health outcomes.
- Evaluate strategies to address current diet and health disparities and related chronic disease disparities among low-income and underrepresented persons.
- Examine the impact of programs and policies that target social determinants of health on nutrition and nutrition-related health outcomes.

B. Expanding the Etiologies of and Strategies to Address Hunger, Food and Nutrition Insecurity

The Academy has further tailored research topics in line with the Research Priorities, which if

answered, would deepen the understanding of etiologies contributing to food insecurity and methods for effectively addressing it and increased support for a diverse, nutrition and dietetic focused workforce.

- 1) Research addressing why hunger persists, including how limited opportunities for economic mobility and other inequities and social determinants of health have contributed to hunger, along with research needed to address this such as:
 - a. How malnutrition should be incorporated to the research on food and nutrition insecurity?
 - b. How can access to healthcare and interventions, such as Medical Nutrition Therapy and Intensive Behavioral Therapy be used to address our current diet-related disease crisis? Research needs to expand beyond access to healthy food and the built environment and focus on how strategies can complement one another.
- 2) Research to understand examples of effective coordination between federal, state, counties and/or non-governmental organizations and programs that have addressed hunger, food insecurity and nutrition insecurity through research, policies, implementation strategies or regulations.
 - a. Effective program examples: School lunch program, WIC Farmers Market Nutrition Program, SNAP, Seniors Farmers Market Nutrition Program, GusNIP, Senior Nutrition Programs, etc.
- 3) Research to better understand how different federal nutrition programs across multiple agencies effectively improve food and nutrition security such as:
 - a. What role does nutrition care (MNT) play as part of health care/clinical services in achieving health equity for individuals across the lifecycle who are food insecure?
 - b. What is the impact of increased allotment for fruit and vegetable vouchers for WIC participants?
 - c. What is the impact of SNAP financial incentives?
 - d. How can current federal programs on food insecurity (i.e. SNAP and WIC) complement other social programs (i.e. Medicaid)?
 - e. How can the Dietary Guidelines for America drive agriculture and climate change policies?
- 4) Experiences with strategies or innovative interventions that are working, could be improved or not working to address food insecurity and neighborhood food environments and to promoting health equity related to diet related chronic diseases, including research strategies that could be applied to examine the potential translatability of these strategies/interventions to other settings or diverse populations. For example:
 - a. What is the outcome when nutritional interventions are adapted to meet the language, culture and context of the target populations and include deep level structural adaptations compared to when they are not?
 - b. How can the U.S. ensure a well-trained and diverse workforce of nutrition

- research professionals and nutrition and dietetic practitioners exists?
- c. What evidence is needed to secure insurance reimbursement for those nutrition practitioners in the public health sector?
 - d. How can we increase support for nutrition and dietetic practitioners to become advanced-level researchers?
- 5) Implementation science research needed to examine the efficacy of providing specific resources or approaches to eliminate hunger and food insecurity and improve nutrition security and health for all.

C. Conclusion

The Academy appreciates the opportunity to submit comments to the National Institute of Health's "*RFI: Research Opportunities to End Hunger, Food and Nutrition Insecurity*". We urge the NIH to also advocate for the appropriate allocation of funding for nutrition related research to address these critical research questions. Please contact either Jeanne Blankenship at 312-899-1730 or jblankenship@eatright.org or Liz Campbell at 202-775-8277 ext. 6021 or ecampbell@eatright.org, with any questions or requests for additional information.

Sincerely,



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