

May 15, 2020

Jeffrey M. Zirger,
Information Collection Review Office
Centers for Disease Control and Prevention
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RE: School Health Profiles Test-Retest Reliability Study (CDC-2020-05313)

Dear Mr. Zirger:

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit comments to the Centers for Disease Control and Prevention related to its request for feedback on the School Health Profiles Test-Retest Reliability Study (CDC-2020-05313), originally published in the Federal Register on March 16, 2020 (85 FR 14942). Representing more than 107,000 registered dietitian nutritionists (RDNs),¹ 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 test the reliability of the data collected through the School Health Profiles questionnaires administered by state and local agencies. These health profiles are an important tool for public health professionals, including registered dietitians, to understand the impact of school policies on children’s dietary and physical activity behaviors.

Necessity and Utility of Collected Information

Research has provided evidence that the school nutrition environment is associated with youth dietary and physical activity behaviors and obesity.^{2,3,4} The data collected with the School Health Profiles questionnaire is important and necessary in order to develop policies, practices, and programs that protect and support student health and provide needed services. School Health Profiles data is also used by leaders and decision makers in

¹The 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.

²Briefel RR, Crepinsek MK, Cabili C, Wilson A, Gleason PM. School food environments and practices affect dietetic behaviors of US public school children. *Journal of the American Dietetic Association* 2009;109(Suppl 1):S91–S107.

³Welker E, Lott M, Story M. The school food environment and obesity prevention: progress over the last decade. *Current Obesity Reports* 2016;5:145–155.

⁴Fox MK, Dodd AH, Wilson A, Gleason PM. Association between school food environment and practices and body mass index of US public school children. *Journal of the American Dietetic Association* 2009;109(Suppl 2):S108–S117. 47. Chriqui JF, Pickel M, Story M. Influence of school competitive food and beverage policies on obesity, consumption, and availability: A systematic review. *JAMA Pediatrics* 2014;168(3):279–86

schools, school districts, and state education agencies to understand the gaps in policies and practices that can impact student health and academic performance. The profiles are the only nationwide, comprehensive analysis of school policies. This data collection is also unique because it allows for data to be tracked over time and to inform policy makers on what had been effective in the past and where resources should be directed in the future. Given the critical role this data plays in informing public health policies in the education setting, and for decision makers to monitor the impact of their decisions over time, it is important to confirm that the test is reliable. The Academy supports and applauds the CDC efforts to test the reliability of the survey to ensure it produces consistent results.

Please contact either Jeanne Blankenship at 312-899-1730 or by email at jblankenship@eatright.org or Liz Campbell at 202-775-8277 ext. 6021 or by email at ecampbell@eatright.org with any questions or requests for additional information.

Sincerely,



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