

September 10, 2019

Linda Kantor
Food Economics Division
Economic Research Service
U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, DC 20250

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

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

RE: Second National Household Food Acquisition and Purchase Survey (FoodAPS-2) (2019-14937)

Dear Ms. Kantor:

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit comments to the USDA in response to its request for feedback on the Second National Household Food Acquisition and Purchase Survey (FoodAPS-2) (2019-14937), originally published in the Federal Register on July 15, 2019 (84 FR 33735). 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 conduct a field test for the Second National Household Food Acquisition and Purchase Survey. The original study provided unprecedented insights into the food acquisition and purchasing patterns of Americans; Academy members look forward to examining changes to those patterns over the last decade in order to inform evidence-based nutrition promotion, education, and intervention practices and policies.

A. Importance of studying household food acquisition and purchases

Data collected through FoodAPS have allowed for the examination of unanswered questions related to food acquisition and purchasing patterns of Americans. Publications using this data set range from adequacy of SNAP benefits to purchase a healthy diet, to how geographic location and access to retail outlets impact food security and diet quality.

Although the original FoodAPS data is useful, significant changes to the food environment, increased interest in sustainable food production and acquisition methods, and demand for consumer information to enhance food choices are among the many developments over the

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.

last decade that will definitively impact the behaviors of Americans and should be better understood to inform future nutrition programs, practices and policies.

B. Estimate of the burden of the proposed collection

The Academy echoes the concerns of Maitlen and Li² as well as Page et al³ that the low response rate from the original FoodAPS data collection may have increased the potential for nonresponse bias. These authors suggest that the low response rate was likely due to the complexity of the data collection requirements. It will be important to continue to consider how to reduce the burden of the data collected while maintaining its integrity. The Academy applauds USDA's efforts to test newly designed screening and automated data collection tools to improve participation and support complete data sets.

Aside from the estimated burden of the data collection, the Academy suggests consideration of how the current political environment in light of the newly released final public charge rule may impact participation in government funded data collection efforts and recommends partnering with local and trusted community organizations to recruit and facilitate this process, even as the field test moves away from in-person screening. Additionally, the Academy suggests questions be included during the field testing of the incentive structures to determine if the tested incentive amounts were effective and to what degree participation would improve as the financial incentive increased.

C. Enhanced quality, utility and clarity of the information to be collected

FoodAPS methodology and best practices are well studied and the Academy encourages the USDA to rely on these evaluations to improve data collection efforts for FoodAPS-2.^{4,5,6,7} In addition to the formal reviews and assessment that were done on the FoodAPS research project, the Academy urges USDA to consider adding questions that will capture how current administrative proposed rules to programs like the Supplemental Nutrition Assistance Program and school meals may impact the dietary quality, food security and food acquisition patterns of households. Specifically, the Academy suggests collecting data related to the SNAP retail flexibility, SNAP able bodied adult without dependents and the elimination of categorical eligibility in SNAP proposed rules if they go into effect as written. Additionally, the Academy suggests that study questions be adjusted to assess knowledge and attitudes towards current trends, such as sustainability and climate change, on the impact of food choices and how this study can better support efforts to reduce food waste and food loss in the United States. Lastly, the Academy is concerned about the translation of this data set to policy and practice efforts

2 Maitland A., Li L. 2016. Review of the Completeness and Accuracy of FoodAPS 2012 Data. Prepared for the Economic Research Service, U.S. Department of Agriculture.

3 The National Household Food Acquisition and Purchase Survey: Innovations and Research Insight. <https://academic.oup.com/aapp/article/41/2/215/5372475#131940446>. Accessed September 10, 2019.

4 Krenzke T., Kali J.. 2016. Review of the FoodAPS 2012 Sample Design . Prepared for the Economic Research Service, U.S. Department of Agriculture.

5 Li J., Van de Kerckhove W., Krenzke T.. 2016. Review of the FoodAPS 2012 Imputation Approaches for Income and Price Data . Prepared for the Economic Research Service, U.S. Department of Agriculture.

6 Petraglia E., Kerckhove W. Van de, Krenzke T.. 2016. Review of the Potential for Nonresponse Bias in FoodAPS 2012 . Prepared for the Economic Research Service, U.S. Department of Agriculture.

7 Yan T., Maitland A.. 2016. Review of the FoodAPS 2012 Instrument Design, Response Burden, Use of Incentives, and Response Rates . Prepared for the Economic Research Service, U.S. Department of Agriculture.

given the relocation plan for the Economic Research Service away from policy makers in the Washington, D.C. metro area. The collection of the first set of FoodAPS data and how it was translated into policy and practice efforts among divisions within USDA is an exemplary reason for keeping the research and policy divisions of USDA together.

D. Conclusion

The Academy appreciates the opportunity to submit comments to the USDA in response to its request for feedback on the Second National Household Food Acquisition and Purchase Survey (FoodAPS-2) (2019-14937). We urge USDA to consider adjustments to the survey instruments and data collection protocol in order to best solicit quality responses that support the intent of the data collection efforts. 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,



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