

December 21, 2021

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Re: AHRQ's Role in Climate Change and Environmental Justice

Dear Mr. Sandmeyer:

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit these comments to the Agency of Healthcare Research and Quality relative to its October 13, 2021 request for information on AHRQ’s *Role in Climate Change and Environmental Justice*. Representing more than 112,000 registered dietitian nutritionists (RDNs)¹, nutrition and dietetics technicians, registered, and advanced degree nutritionists, the Academy is the largest association of food and nutrition professionals in the world and is committed to a vision of the world where all people thrive through the transformative power of food and nutrition. Our members provide medical nutrition therapy, especially for conditions likely to be worsened by the effects of climate change.

The Academy supports this proposed information collection and suggests that AHRQ utilize this information toward their role in providing recommendations to help build the healthcare system’s resilience to climate threats, reduce the healthcare industry’s contribution to climate change, and address environmental issues in healthcare. The Academy recommends that AHRQ emphasize the critical role of reliable supply chains, facility preparation and the value of medical nutrition therapy to moderate the chronic disease states likely to be exacerbated by the effects of climate change.

The Academy is committed to improving the health of Americans by supporting access to quality health care, including medical nutrition therapy. Health care delivery can be affected by social determinants of health, which are defined as conditions in the places where people live, learn, work, and play that affect a wide range of health risks and outcomes. Social determinants, such as food insecurity, contribute to health inequities observed within communities, as poverty and racial segregation frequently limit access to health care.² Additionally, chronic disease severity

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 Peregrin, T. (2021). Social Determinants of Health: Enhancing Health Equity. *Journal of the Academy of Nutrition and Dietetics*, 121(6), 1175–1178. <https://doi.org/10.1016/j.jand.2021.02.030>

will likely be exacerbated in extremes of temperature, and these conditions are more likely to affect populations already affected by adverse socio-economic conditions,³ thus further compounding the stress to existing health care systems. Therefore, advancing health care quality amidst climate change requires effective interventions, along with adequate funding and staff training to better address these determinants of health and thereby support increased access and utilization of quality health care as well as research to measure impact on health-related outcomes.^{4,5}

Supply chains are critical for food service and healthcare. As a result of climate change, extreme weather events such as winter storms, floods, and heat waves are expected to increase in frequency and intensity in the coming years; long-term threats to food supply are also forecast.⁶ Those already at risk may incur many potential climate-related health impacts, both physical as well as mental. Health-related systems and facilities may be affected as well via effects on patients, staff, various supplies and materials used anywhere throughout the institution, basic operations, and essential infrastructure. Therefore, system administrators would benefit from access to clear information about current risks, future projections and necessary resources to mount effective and appropriate responses.⁷

Health care system and institutional leaders would also benefit from development of disaster scenario protocols and other suitable training, as well physical infrastructure needs in the face of increased risk of extreme weather events.⁸ As learned from the effects of the COVID-19 pandemic, businesses and institutions in general would also benefit from development of multiple and shorter supply chains to increase reliability, reduce losses due to food spoilage and minimize the risks of supply disruption.^{9,10,11} Thus, multiple and shorter supply chains would

³ Liu C, Yavar Z, Sun Q. Cardiovascular response to thermoregulatory challenges. *Am J Physiol Heart Circ Physiol*. 2015 Dec 1;309(11):H1793-812. doi: 10.1152/ajpheart.00199.2015.

⁴ Ibid.

⁵ Magnan, S. 2017. Social Determinants of Health 101 for Health Care: Five Plus Five. NAM Perspectives. Discussion Paper, National Academy of Medicine, Washington, DC. <https://doi.org/10.31478/201710c>

⁶ Hecht, A. A., Biehl, E., Barnett, D. J., & Neff, R. A. (2019). Urban Food Supply Chain Resilience for crises threatening food security: A qualitative study. *Journal of the Academy of Nutrition and Dietetics*, 119(2), 211–224. <https://doi.org/10.1016/j.jand.2018.09.001>

⁷ Ebi, K. L., Vanos, J., Baldwin, J. W., Bell, J. E., Hondula, D. M., Errett, N. A., Hayes, K., Reid, C. E., Saha, S., Spector, J., & Berry, P. (2021). Extreme weather and climate change: Population health and health system implications. *Annual Review of Public Health*, 42(1), 293–315. <https://doi.org/10.1146/annurev-publhealth-012420-105026>

⁸ Ibid.

⁹ Bisoffi, S., Ahrné, L., Aschemann-Witzel, J., Báldi, A., Cuhls, K., DeClerck, F., Duncan, J., Hansen, H.O., Hudson, R.L., Kohl, J., Ruiz, B., Siebielec, G., Treyer, S., Brunori, G. (March 8, 2021). COVID-19 and Sustainable Food Systems: What Should We Learn Before the Next Emergency. *Front. Sustain. Food Syst*. <https://doi.org/10.3389/fsufs.2021.650987>

¹⁰ Foster, J. (December 14, 2020). COVID-19's Impact on Food Manufacturing, Supply Chains and More. <https://www.foodlogistics.com/sustainability/agriculture/article/21203427/covid19s-impact-on-food-manufacturing-supply-chains-and-more>

¹¹ WinklerPrins, A.M.G.A. (2017). Defining and Theorizing Global Urban Agriculture (pp. 1-11); and Global Urban Agriculture into the Future: Urban Cultivation as Accepted Practice (pp. 242-248). In WinklerPrins, A.M.G.A. (Ed.), *Global Urban Agriculture*. Boston, MA: CABI.

enhance healthcare facility resiliency, while reliable food supplies would support health care quality and shorter hospital stays.¹²

Access to safe water supplies is essential to the Academy's mission. As seen during the COVID-19 pandemic, food security and access to safe water depends on the ability of organizations to continue to operate and recover quickly. Populations of color, especially those with social and economic disadvantages, are particularly affected by inadequate access to potable drinking water supplies or systems.¹³ The increased risk of extreme weather events associated with climate change also increases risk to water infrastructures.¹⁴

Accordingly, the Academy respectfully recommends the agency create educational or learning modules for health care providers and clinicians, further support AHRQ's partnership with public health experts, and issue recommendations for a stronger public health infrastructure. AHRQ's data and analytics team could also have useful roles, such as collecting data on how vulnerable patients are adversely affected by climate change, and best practices in response.

The Academy appreciates your consideration of our comment for the information request AHRQ's *Role in Climate Change and Environmental Justice*. 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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¹² Young C, Farrah K. (2019). Room Service Food Delivery Models for Hospital In-Patients: A Review of Clinical Effectiveness, Cost-Effectiveness, and Guidelines [Internet]. Ottawa (ON): Canadian Agency for Drugs and Technologies in Health. <https://www.ncbi.nlm.nih.gov/books/NBK545103/>

¹³ Academy of Nutrition and Dietetics. (April 7, 2020). Comments re Academy Highlights Importance of Reliable Potable Water Supplies at <https://www.eatrightpro.org/news-center/on-the-pulse-of-public-policy/regulatory-comments/academy-highlights-importance-of-reliable-potable-water-supplies>

¹⁴ Ebi, K. L., Vanos, J., Baldwin, J. W., Bell, J. E., Hondula, D. M., Errett, N. A., Hayes, K., Reid, C. E., Saha, S., Spector, J., & Berry, P. (2021). Extreme weather and climate change: Population health and health system implications. *Annual Review of Public Health*, 42(1), 293–315. <https://doi.org/10.1146/annurev-publhealth-012420-105026>