

October 21, 2020

CDC Desk Officer
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Reference: National Healthcare Safety Network (NHSN) Coronavirus (COVID-19) Surveillance in Healthcare Facilities

Dear CDC Desk Officer:

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit these comments to the Centers for Disease Control and Prevention relative to its September 21, 2020 information request: *National Healthcare Safety Network (NHSN) Coronavirus (COVID-19) Surveillance in Healthcare Facilities*. Representing more than 107,000 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. Every day our members provide medical nutrition therapy for patients in a variety of clinical settings, including during the COVID outbreak.

The Academy supports this information collection to facilitate improved understanding and response to healthcare associated infections, including COVID-19. We offer the below comments and suggestions to enhance the utility of the information collection and especially to improve awareness of the importance of RDNs and medical nutrition therapy at all stages of the COVID-19 treatment process.

Specific Suggestions for Survey Questions

A. Because of the critical role of registered dietitian nutritionists in providing substantial care for patients in an ICU or on mechanical ventilation,^{2,3} registered dietitian nutritionists should be recognized in the surveys as a clinical team member. Therefore,

- In the document “COVID–19 Module: Dialysis Outpatient Facility,” in the table titled “Staff and/or Personnel Impact,” the Academy recommends including “Registered Dietitian Nutritionist” as listed clinical staff in the column “Staff and Personnel Groups.”
- In the document “COVID-19 Module: Long Term Care Facility: Staff and Personnel Impact,” in the column “Staff and Personnel Groups” in the staff shortage table, the

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 Massanet PL, Petit L, Louart B, Corne P, Richard C, Preiser JC. Nutrition rehabilitation in the intensive care unit. *JPEN J Parenter Enteral Nutr.* 2015 May;39(4):391-400. doi: 10.1177/0148607114567901. Epub 2015 Jan 13. PMID: 25587007.

³ Baldonado A, Naqvi Mugler A, Garland A, Sherck J, Chin DE, Ely R, Barrett-Sheridan S. Evidence-based practice strategy: increasing timely nutrition in mechanically ventilated trauma surgical patients. *Dimens Crit Care Nurs.* 2011 Nov-Dec;30(6):346-55. doi: 10.1097/DCC.0b013e31822fab62. PMID: 21983512.

Academy recommends including “Registered Dietitian Nutritionist” as listed clinical staff.

B. The form “Long Term Care Facility: Supplies and Personal Protective Equipment” would benefit from additional clarity in the question “Do you have enough for one week?” This may not be sufficiently specific, as supplies may be adequate if there is no COVID-19 outbreak.

- Accordingly, the Academy recommends re-wording the question to: “If the facility sustains a COVID-19 outbreak in the next week, does the facility have enough PPE?”

C. Tubing for enteral nutrition administration was in short supply even prior to COVID-19, and requires further modification to properly deliver formula and water flushes. These processes can directly impact tolerance of the formula as well as the staff time for administration to the resident. Because enteral feeding supplies and related tubing, pumps and various supplemental formulas directly impact patient care, the Academy recommends the adequacy of supply of these items be surveyed. Such content may be appended to the form “COVID-19 Module: Long Term Care Facility: Supplies and Personal Protective Equipment,” or via a separate document.

The Academy appreciates your consideration of our comment for the *National Healthcare Safety Network (NHSN) Coronavirus (COVID-19) Surveillance in Healthcare Facilities* information collection. 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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