

May 10, 2021

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*Reference: Information Collection: Access, Exchange and Use of Social Determinants of Health Data in Clinical Notes; Document Identifier 0955-New-60D*

Dear Ms. Funn:

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit these comments to the Department of Health and Human Services relative to its March 11, 2021 request for comment on the information collection: *Access, Exchange and Use of Social Determinants of Health Data in Clinical Notes*. Representing more than 107,000 registered dietitian nutritionists (RDNs),<sup>1</sup> nutrition and dietetic technicians, registered (NDTRs), and advanced degree nutritionists, the Academy is the world’s largest association of food and nutrition professionals and is committed to a vision of a world where all people thrive through the transformative power of food and nutrition. Every day our members provide medical nutrition therapy for patients in clinical, public health, and other settings across the continuum of care, often via telehealth, with the flexibilities necessary due to the COVID-19 public health emergency.

**The Academy supports this information collection to ensure clinical care practices are optimized for all patients, regardless of demographics. To better promote health equity, it is essential that health care providers understand the relationship between social determinants of health and related costs, utilization, and outcomes, and be able to effectively adjust clinical care practices accordingly.**

### **Background**

The Academy strongly supports the agency’s efforts to standardize effective inclusion and application of social determinants of health (SDOH) data in health care. The importance of addressing SDOH has been widely recognized,<sup>2</sup> and is endorsed by Healthy People 2020,<sup>3</sup>

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<sup>1</sup> 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.

<sup>2</sup> Braveman P, Egerter S, Williams DR. The Social Determinants of Health: Coming of Age. *Annu Rev Public Health*. 2011;32:381-98. DOI: 10.1146/annurev-publhealth-031210-101218

<sup>3</sup> U.S. Office of Disease Prevention and Health Promotion. “2020 Topics & Objectives: Social Determinants of Health.” *HealthyPeople.gov*. <https://www.healthypeople.gov/2020/topics-objectives/topic/social-determinants-ofhealth>. Accessed June 12, 2020.

the World Health Organization,<sup>4</sup> and the National Partnership for Action to End Health Disparities.<sup>5</sup> It is also recognized that behavioral factors, such as physical activity level, diet quality, alcohol intake, and tobacco use contribute substantially to chronic disease risk, management and outcomes and are also influenced by SDOH.<sup>6</sup> Thus, SDOH directly affect patients' ability to effectively access culturally-appropriate quality care, and thus are a key driver of costs and health care utilization as well.<sup>7</sup>

### **Specific Content**

Because the United States Core Data for Interoperability is an important mechanism for capturing standardized data elements to support interoperability, the Academy encourages the inclusion of SDOH-related data elements, especially those related to food security. The Academy's support for effective capture of SDOH data is demonstrated by our participation in the Gravity Project, which focuses on identifying the data elements currently available as well as the data elements needed to represent food security and other areas that shape SDOH, such as housing and transportation.<sup>8</sup> In addition, the Gravity Project addresses the need to be able to electronically capture and exchange this data across a variety of stakeholders. The interoperability gap can be addressed through the development of standardized guidance providing instructions on how data should be exchanged.

Additionally, RDNs are an integral part of the clinical care team and are highly qualified to provide meaningful recommendations to help patients address poor food security. As a result, RDNs could provide unique, valuable data on their capture of SDOH in their clinical notes. Therefore, the Academy respectfully encourages the Department of Health and Human Services to

- include RDNs among the health care providers recruited to participate in both the qualitative and quantitative research.
- include "registered dietitian nutritionist" on the options list of non-physician professionals on page four of Appendix A: Prescreening Questionnaires.

The Academy appreciates your consideration of our comment for the information collection: *Access, Exchange and Use of Social Determinants of Health Data in Clinical Notes*. Please contact either Jeanne Blankenship at 312-899-1730 or by email at

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<sup>4</sup> World Health Organization. "Social Determinants of Health." WHO.int. [https://www.who.int/social\\_determinants/](https://www.who.int/social_determinants/). Accessed June 12, 2020.

<sup>5</sup> National Partnership for Action to End Health Disparities, U.S. Department of Health and Human Services Office of Minority Health. National Partnership for Action to End Health Disparities Toolkit for Community Action. Rockville, M.D.: U.S. Department of Health and Human Services. [https://minorityhealth.hhs.gov/npa/files/Plans/Toolkit/NPA\\_Toolkit.pdf](https://minorityhealth.hhs.gov/npa/files/Plans/Toolkit/NPA_Toolkit.pdf). Accessed June 12, 2020.

<sup>6</sup> Schmidt H. Chapter 5 Chronic Disease Prevention and Health Promotion. In Barrett DH, Ortmann LW, Dawson A, et al., editors. Public Health Ethics: Cases Spanning the Globe. Cham (CH): Springer. 2016.

<sup>7</sup> Kreuter MW, Thompson T, McQueen A, Garg R. Addressing Social Needs in Health Care Settings: Evidence, Challenges, and Opportunities for Public Health. *Annu Rev Public Health*. 2021 Apr 1;42:329-344. doi: 10.1146/annurev-publhealth-090419-102204.

<sup>8</sup> The Gravity Project. <https://confluence.hl7.org/display/GRAV/The+Gravity+Project>

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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