

**Appendix D3.3.**  
**Federal Register 60-Day Notice Public**  
**Comment 3**

September 19, 2016

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Nutrition Services and Access Branch  
Food and Nutrition Service  
U.S. Department of Agriculture  
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*Re: Information Collection re Food Distribution Program on Indian Reservations Nutrition Paraprofessional Training Assessment for Indian Tribal Organizations (OMB Control Number: 0584—NEW)*

Dear Ms. White,

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit comments to the Food and Nutrition Service (FNS) at the United States Department of Agriculture (USDA) related to its July 19, 2016 information collection, “*Food Distribution Program on Indian Reservations (FDPIR) Nutrition Paraprofessional Training Assessment for Indian Tribal Organizations.*” Representing more than 100,000 registered dietitian nutritionists (RDNs),<sup>1</sup> dietetic technicians, registered (DTRs), and advanced-degree nutritionists, the Academy is the largest association of food and nutrition professionals in the United States and is committed to improving the nation’s health through food and nutrition across the lifecycle. Our members serve in numerous roles improving the health of native populations in community, clinical, government, and managerial settings.

The Academy strongly supports efforts by the FNS to deliver paraprofessional training to staff and encourages the FNS to utilize the vast expertise of nutrition educators in the SNAP-Ed and Family Nutrition Education Programs (FNEP) as resources. We recognize the need to avoid duplicative or overlapping efforts between FNS programs, and support efforts to provide training at the right place at the right time by individuals with necessary cultural competencies. As food is distributed from warehouses, nutrition education at these venues could be effective and efficient; the Academy stands ready to support FNS in its endeavors. We remain committed both to promoting the consumption of local and traditional foods and helping recipients integrate their own local culture and traditions into nutrition promotion efforts.

We encourage FNS to engage members of the Indian Tribal Organizations to learn what methods would be most effective for achieving the goals of FNS. These efforts may include working with individual tribal organizations to identify unique issues that could facilitate or deter achieving the desired outcomes. We note the importance of avoiding sweeping assumptions that what might ‘work’ with one tribal organization will be effective more broadly.

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<sup>1</sup> The Academy recently 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.

The Academy sincerely appreciates the opportunity to offer comments to FNS regarding FDPIR nutrition paraprofessional training assessment for Indian Tribal Organizations. Please contact either Jeanne Blankenship by telephone at 312-899-1730 or by email at [jblankenship@eatright.org](mailto:jblankenship@eatright.org) or Pepin Tuma by telephone at 202-775-8277 ext. 6001 or by email at [ptuma@eatright.org](mailto:ptuma@eatright.org) with any questions or requests for additional information.

Sincerely,



Jeanne Blankenship, MS RDN  
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