June 30, 2011

Centers for Disease Control and Prevention
National Center for Health Statistics
1600 Clifton Road, MS-D74
Atlanta, GA 30333

RE: National Health and Nutrition Examination Survey (NHANES); Docket No. 2011-10703

The Center for Science in the Public Interest (CSPI)\(^1\) supports the continuation of funding for the National Health and Nutrition Examination Survey (NHANES) and appreciates the opportunity to comment on the importance of this data gathering effort, particularly in the realm of food safety. The Office of Management and Budget should approve this data collection. Understanding the review is a requirement of the Paperwork Reduction Act, which has as its purpose minimizing the burdens imposed and assuring the greatest public benefit from information collected by the government, CSPI offers the following comment.

A strong public interest is served by improving our understanding of foodborne illness. Each year foodborne illness sickens 48 million Americans of whom 120,000 are hospitalized and 3,000 die prematurely. However, although NHANES surveys typically ask detailed questions about consumer health and nutrition, few—if any—questions are aimed at collecting data related to foodborne illness. We believe that this survey instrument could prove very valuable at collecting data to supplement existing foodborne illness outbreak data sets (including FoodNet) and we urge CDC to consider expanding the survey to encompass these issues.

Specifically, we propose a set of survey questions designed to elicit consumer responses about the rate of gastrointestinal illness, as these illnesses are often caused by Norovirus and other common foodborne pathogens. Consumers should be asked questions about frequency, duration, and severity of diarrheal illness, including whether or not other family members experienced the same symptoms. It would also be useful to gather information on whether or not consumers experiencing these illnesses sought medical treatment, and if so, what steps were taken to identify the cause of the illness (i.e., stool samples, etc.).

In addition, the survey instrument should include questions specifically for women who may recently have been pregnant. Pregnant women, children, and immune-compromised

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\(^1\) CSPI is a non-profit consumer advocacy and education organization that focuses largely on food safety and nutrition issues. It is supported principally by the 900,000 subscribers to its Nutrition Action Healthletter and by foundation grants.
consumers are at increased risk of contracting foodborne illnesses, and any additional data on their consumption and illness habits could be very useful in targeting prevention strategies. We suggest questions for pregnant or recently-pregnant women designed to assess their knowledge of their increased risk, including whether they are receiving food safety advice from their primary care or obstetric physician. In addition, drafters could ask respondents about diagnosis of listeriosis, Toxoplasmosis, and other foodborne illnesses that can affect pregnancy. We would also urge the survey drafters to include questions relating to recent miscarriages, since miscarriages can be related to *Listeria*, a common foodborne pathogen. Our current understanding of the rates of listeriosis, for example, among pregnant women is limited, since many miscarriages may be categorized as “unexplained” when in fact they may be linked to foodborne illness. Additional data on this issue would be helpful in determining the scope of the problem and developing strategies to mitigate it.

We believe the proposed data collection—particularly with an added focus on foodborne illness data—will produce benefits to public health analysts and providers that outweigh any burden it may impose on the public. We encourage OMB to approve the collection and for CDC to proceed expeditiously in the design and implementation of the program.

Sincerely,

Sarah A. Klein, J.D., M.A.
Staff Attorney, Food Safety Program