NATIONAL EDUCATION ASSOCIATION

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October 19, 2026

Submitted via regulations.gov

Jeffrey M. Zirger
Lead, Information Collection Review Office
Office of Public Health Ethics and Regulations, Office of Science
Center for Disease Control
1600 Clifton Road NE, MS H21-8
Atlanta, GA 30329

Re: CDC-2026-1387; Proposed Data Collection Submitted for Public Comment and Recommendations

Dear Dr. Zirger:

On behalf of the approximately 3 million members of the National Education Association (NEA), we submit the following comments in response to the Center for Disease Control's (CDC) *Proposed Data Collection Submitted for Public Comment and Recommendations***,** on the proposed redesign of the National Health Interview Survey (NHIS) published in the Federal Register on August 20, 2026. **We strongly urge the CDC to retain questions measuring household food insecurity in the 2028 NHIS.**

For more than a decade, the NHIS has provided an important source of nationally representative data on food insecurity and its relationship to health. Removing the food security module would create a significant gap in our ability to understand whether programs such as the Supplemental Nutrition Assistance Program (SNAP) reduce food insecurity and how food insecurity is associated with health outcomes for children and adults.

This data gap is particularly concerning for educators and students. Research consistently demonstrates that food insecurity can adversely affect children's cognitive development, behavior, and academic achievement.[1] A systematic review of research in high-income countries found

[1] https://www.nokidhungry.org/sites/default/files/child-economy-study.pdf; https://pmc.ncbi.nlm.nih.gov/articles/PMC8431639/

evidence linking food insecurity with academic and cognitive outcomes and behavioral difficulties.[2] Research from Children's HealthWatch likewise documents the relationship between food insecurity, child development, and school readiness.[3]

The loss of NHIS food security data would also come at a particularly consequential time. Federal sources of information on household food insecurity are already becoming more limited, while changes to SNAP and growing challenges for school districts in proving school meals make timely, reliable data even more important. The most recent USDA report shows that 13.7 percent of U.S. households experienced food insecurity in 2024,[4] but this report and the data collection used to produce it have been canceled. If the food security module is eliminated from the NHIS, the nation will be without a consistent measure of child food insecurity, a key factor in student success.

For educators, understanding food insecurity is not simply a matter of tracking household economic conditions. It is essential to understanding students' health, well-being, readiness to learn, and ability to succeed in school. Without a consistent measure in the NHIS, researchers and policymakers will have substantially less ability to examine these relationships over time to evaluate the effects of nutrition assistance programs.

NEA therefore urges the CDC to retain the food security module in the 2028 NHIS and preserve this critical source of information about the health and educational well-being of America's children and families.

We respectfully submit these comments for consideration. Please do not hesitate to contact me or Bianca Singh at BSingh@nea.org should you have any questions.

Sincerely,



Stacey Pelika, Ph.D.
Director of Research
National Education Association

[2] https://pmc.ncbi.nlm.nih.gov/articles/PMC8431639/
[3] https://www.childrenshealthwatch.org/wp-content/uploads/toohungrytolearn_report.pdf
[4] https://ers.usda.gov/publications/113622